

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 0:24-CV-60984-ROSENBERG/AUGUSTIN-BIRCH

ORIGINAL

MELINDA MICHAELS,

Plaintiff,

v.

SEAWATER PRO, LLC, AND
MICHAEL SPANOS,

Defendants.

DEPOSITION OF MELINDA MICHAELS
TAKEN ON BEHALF OF THE DEFENDANTS

JANUARY 21, 2025
10:05 A.M. TO 5:12 P.M.

UNIVERSAL COURT REPORTING
888 E. LAS OLAS BLVD., SUITE 508
FORT LAUDERDALE, FLORIDA 33301

REPORTED BY:
GINA PETRILLO, CER, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA



Office Phone: 954-712-2600

Email: info@ucrinc.com

Website: ucrinc.com

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Page 2

01
02
03
04
05
06
07
08
09
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES OF COUNSEL

ON BEHALF OF THE PLAINTIFF:

DILLON CUTHBERTSON, ESQUIRE
KOZ LAW, P.A.
800 E. CYPRESS CREEK ROAD, SUITE 421
FORT LAUDERDALE, FLORIDA 33334
786-924-9929
DC@KOZLAWFIRM.COM

ON BEHALF OF THE DEFENDANT:

BRIAN POLLOCK, ESQUIRE
FAIRLAW FIRM
135 SAN LORENZO AVENUE, SUITE 770
CORAL GABLES, FLORIDA 33146
305-230-4884
BRIAN@FAIRLAWATTORNEY.COM

01
02
03
04
05
06
07
08
09
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

INDEX OF EXAMINATION	
WITNESS: Melinda Michaels	PAGE
DIRECT EXAMINATION	
By: Brian Pollock, Esquire	5

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Page 4

01	INDEX OF EXHIBITS		
02	EXHIBIT	DESCRIPTION	PAGE
03	EXHIBIT 101	BANK STATEMENT	86
04	EXHIBIT 102	CASE CLERK RESULT	135
05	EXHIBIT 103	NOTES	138
06	EXHIBIT 104	GOOGLE REVIEW	146
07	EXHIBIT 105	PICTURE OF ITEM SOLD	150
08	EXHIBIT 106	SUMMONS AND COMPLAINT	152
09	EXHIBIT 107	DEMAND LETTER	153
10	EXHIBIT 108	AMENDED COMPLAINT	161
11	EXHIBIT 109	STATEMENT OF WAGES	172
12	EXHIBIT 110	RESPONSE TO WRITTEN QUEST	204
13	EXHIBIT 111	AMENDED REQUEST FOR INFORMATION	214
14	EXHIBIT 112	251-256	217
15	EXHIBIT 113	COMPLAINT WELLS FARGO	220
16	EXHIBIT 114	PLAINTIFF'S 303 PHOTOGRAPH	223
17	EXHIBIT 115	PHOTOGRAPH	224
18			
19			
20			
21			
22			
23			
24			
25			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Page 5

01 DEPOSITION OF MELINDA MICHAELS

02 JANUARY 21, 2025

03 THE COURT REPORTER: Good morning. We are on
04 the record in the matter of Melinda Michaels v.
05 SeaWater Pro, LLC, and Michael Spanos. Case
06 Number 0:24-CV-60984-ROSENBERG/Augustin-Birch. It
07 is January 21st, 2025 at 10:05 a.m.

08 My name is Gina Petrillo. I'm with Universal
09 Court Reporting. I'm a nationally certified Court
10 Reporter through AAERT. My Certification Number
11 is 2836.

12 And I can affirm that no AI is used in the
13 recording or reporting of this proceeding.

14 Counselors, can you please state your names
15 for the record?

16 MR. CUTHBERTSON: Dillon Cuthbertson for the
17 Plaintiff Melinda Michaels.

18 MR. POLLOCK: And Brian Pollock for the
19 Defendants.

20 Thereupon:

21 MELINDA MICHAELS,
22 was called as a witness, and after having been first duly
23 sworn, testified as follows:

24 DIRECT EXAMINATION

25 BY MR. POLLOCK:



Office Phone: 954-712-2600

Email: info@ucrinc.com

Website: ucrinc.com

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Page 6

01 Q Good morning. My name is Brian Pollock. I
02 represent Mr. Spanos and SeaWater Pro. Going to --
03 we're here in to take your deposition in your lawsuit
04 you brought against my clients. May I ask you some
05 questions, and if you don't understand my question,
06 just let me know and I'll try to ask it in a way that
07 you can understand and answer. Fair enough?

08 A Yes.

09 Q And when you answer, please answer with out
10 loud instead of a nod at your head or shaking it back
11 and forth because the transcript is going to reflect
12 that you've nodded your head or shook your head and
13 it's not going to reflect an answer, okay?

14 A Yes.

15 Q And if you need a break, just let me know and
16 I'll go ahead and try to accommodate you, as soon as
17 possible. It's on an endurance contest and we'll try
18 to go through the questions I need to ask. Have you
19 answered them and get out of here as soon as we can,
20 all right?

21 A Yes.

22 Q And Dillon may object today, if he does, that
23 he's preserving his objections for the record. If he
24 doesn't want you to answer something, he's going to
25 make it very clear he doesn't want you to answer. So,

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Page 7

01 if he objects, let him object and then go ahead and
02 answer, all right?

03 A Yes.

04 Q Okay. And then, even though we may get
05 conversational and talk back and forth, it's not like
06 talking with your friends when we talk over one another
07 because if you do, Gina's going to start yelling at
08 both of us or raise -- or getting annoyed at both of us
09 because she can only take down one person talking at a
10 time. So, just do me a favor, let me try to finish my
11 question before you go ahead and answer. Fair enough?

12 A Yes.

13 Q All right. So, Ms. Michaels, you indicated
14 your name was Melinda Michaels. Do you have a middle
15 name?

16 A Yes.

17 Q And what's that?

18 A Faith.

19 Q Have you been known by any other names?

20 A Yes.

21 Q What are those names?

22 A Melinda Murray and Melinda Tubbert.

23 THE COURT REPORTER: Can you spell that for
24 me please?

25 THE WITNESS: T-U-B-B-E-R-T.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Page 8

01 BY MR. POLLOCK:

02 Q Have you given a deposition before?

03 A No.

04 Q Have you been married before?

05 A Yes.

06 Q To whom?

07 A Francis Tubbert IV.

08 Q Okay. And what's your date of birth?

09 A September 8th, 1969.

10 Q And I'm going to ask your social security
11 number, but ask that only the last four be placed on
12 the record.

13 A XXX-XX-9880.

14 Q Okay. Do you have any medical conditions or
15 take any medications that affect your memory or ability
16 to testify truthfully here today?

17 A No.

18 Q Do you understand that you took an oath to
19 tell the truth?

20 A Yes.

21 Q Can we roll on the testimony that you gave --
22 give today as the truth?

23 A Yes.

24 Q And do you understand that the oath that you
25 take -- you took to tell the truth today would be the

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Page 9

01 same oath that you would take if you were testifying
02 down the road in the Courtroom, in the trial of this
03 case?

04 A Yes.

05 Q Does this mean that we can rely on your
06 answers as honest responses to my questions?

07 A Yes.

08 Q What's your current home address?

09 A 37 Hendricks Isle, Slip 4, Fort Lauderdale,
10 Florida 33301.

11 Q How long have you been there?

12 A I've been there -- this past, lease for three
13 years I believe.

14 Q Who do you live there with?

15 A No one.

16 Q Slip 4, meaning you live on a vessel?

17 A Yes.

18 Q What's the name of it?

19 A Mila Mou.

20 Q Mila what?

21 A Mila Mou, M-I-L-A M-O-U.

22 Q And what kind of boat is that?

23 A It's a Maxum SCA 4,100.

24 Q Where'd you live before there?

25 A 212 Briny Apartment A4 Pompano Beach,

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 10

01 Florida. I'm not -- I do not recall the ZIP Code.

02 Q How long did you live at the Briny Avenue --
03 the Briny Avenue Apartment?

04 A A little over two months.

05 Q And you lived there with Mr. Spanos?

06 A Yes, I did.

07 Q We have those two months. How long bef --
08 including those two months, did you live with
09 Mr. Spanos?

10 A Yes.

11 Q Including those two months that you were at
12 the 212 Briny Apartment A4, how long in total did you
13 live with Mr. Spanos?

14 A Over seven years.

15 Q Did you finish high school?

16 A Yes.

17 Q Where from?

18 A Blue Valley High School.

19 Q And where is that?

20 A Stanley, Kansas.

21 Q Did you take any college?

22 A Yes.

23 Q Where from?

24 A Johnson County Community College and
25 Rockhurst College.



Office Phone: 954-712-2600

Email: info@ucrinc.com

Website: ucrinc.com

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 11

01 Q So, Johnson County Community College and?

02 A Rockhurst College.

03 Q Where are those located?

04 A Johnson County Community College is in
05 Johnson County, Kansas. Rockhurst is in Kansas City,
06 Missouri.

07 Q Did you earn any degrees from either of
08 those?

09 A No, I did not.

10 Q Do you have a Florida driver's license?

11 A No, I do not.

12 Q And where's your driver's license from?

13 A Arizona.

14 Q Besides your Arizona driver's license, do you
15 have any other licenses or professional certifications?

16 A Yes, I do.

17 Q What are those?

18 A I have my 100-Ton Captain's license. I have
19 my Pilates Instructor license. I have my group fitness
20 license. I have my -- I have five different aquatics
21 licenses. I also have my Marine Radio Operator's
22 license along with my Six-Pack. I also have a license
23 in narrow feedback. Electro -- EEGs and EKGs.

24 Q You said EEG or EEEKG or --

25 A EKGs. I'm sorry.

01 Q Okay.

02 A And I'm -- I have a feeling I know I've also
03 got a spin license at other various aerobic
04 certifications.

05 Q And the Six-Pack, that's a Marine license?

06 A Yes, it is.

07 Q What does it allow you to do?

08 A It allows me to have six passengers on an
09 uninspected vehicle -- vessel.

10 Q When did you obtain your 100-Ton license?

11 A I obtained that in the summer of -- or
12 actually in the fall -- oh wait, I passed the
13 certifications in the fall of 2023, I believe the
14 license came in 2024 though.

15 Q Okay. And your Six-Pack, when did you get
16 that?

17 A It was -- I did that in the summer of 2023
18 and I did not get an official copy of that license
19 until I applied for my 100-Ton.

20 Q You mentioned five different aquatic
21 licenses. What are those?

22 A I've got SilverSneaker certifications. I've
23 got WaterArt, I've got American Fitness Association.
24 I've also got the US Water Fitness Association and
25 arthritis along with multiple sclerosis.

01 Q The Pilates Instructor license, you've had
02 since when?

03 A 2000 I believe --

04 Q Do you know that --

05 A -- the first one.

06 Q Okay.

07 A Certified Mat Pilates and then my AFAA I
08 received in 2000 -- around 2004.

09 Q AFAA meaning A-F-A?

10 A American Fitness Aerobics Association.

11 Q Do you speak any languages besides English?

12 A No.

13 Q Why did you obtain the 100-Ton Captain's
14 license?

15 A My goal in life was always to live on the
16 water and to create a living on the water. It aides.

17 Q I'm sorry. It aides I didn't hear you.

18 A It aides to create a living on the water if I
19 choose to do so or if I choose to demo any equipment
20 while at Anchor.

21 Q And when did you start -- you have to take a
22 course for that, right?

23 A Yes.

24 Q When did you start that course?

25 A I started that in the summer of 2023 --

01 excuse me, that was 2022. Now, that I think about it,
02 all of those were 2022. Forgive me.

03 Q So, you started the course in '22 --

04 A Yes.

05 Q -- and then when you said all of those?

06 A The Captain's licenses, the MRI received in
07 2023.

08 Q Okay. So, you received your certifications
09 in the fall of '23 for your Captain's license -- for
10 your 100-Ton --

11 A '22. I'm sorry, I am mistaken there.

12 Q Okay. So, you received your -- you passed a
13 certification for your 100-Ton license in the fall of
14 '22. And then you received your license when?

15 A I believe in the '23.

16 Q And talking about your Six-Pack?

17 A It was the summer of 2022.

18 Q Okay. Any other licenses or certifications
19 that we haven't talked about?

20 A I'm sure there is, but I don't recall
21 offhand.

22 Q And what would those be in generally?

23 A Definitely fitness.

24 Q Okay.

25 A Yeah, I know I've also got a PiYO

01 instruction.

02 Q PiYO meaning Pilates Yoga?

03 A Yes. Beach Body Certification.

04 Q 100-Ton Captain's license, that's issued by
05 the Coast Guard. Is that right?

06 A Yes.

07 Q And the Six-Pack, that's also a Coast Guard
08 license?

09 A Yes, it is.

10 Q Okay. Is the Marine Radio a Coast Guard
11 license?

12 A No, it's by the transportation, the FCC.

13 Q When did you obtain that license?

14 A In the fall of 2023, I believe.

15 Q So, other than the 100-Ton Captain's license,
16 the Marine Radio certification and your Six-Pack, the
17 other licenses or certifications that you told us about
18 would've all been provided by private entities as
19 opposed to a government entity. Is that right?

20 A Yes.

21 Q Cell phone numbers, what number are you using
22 now?

23 A Primary number is (954) 838-1968.

24 Q And who's the carrier for that?

25 A Verizon.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 16

01 Q And since when have you used that number?

02 A Since the summer of 2022.

03 Q What about before that?

04 A (913) 710-0840.

05 Q Oh. And that was a Verizon number?

06 A It is gone through the various carriers
07 throughout the years.

08 Q Okay. Was the last carrier Verizon?

09 A It's un -- currently under Verizon.

10 Q Do you still use that number?

11 A Yes, I do.

12 Q And you've had that number since what?

13 A Late '90s.

14 Q Any other cell phone numbers you've used in
15 the past six-years?

16 A I have started another cell phone number that
17 I don't use, because I'm hoping to start another
18 business.

19 Q Okay. What number is that?

20 A (954) 250-4620.

21 Q And there's no phone registered to that or
22 there is a phone but you just don't use it or what's
23 the status?

24 A There is a phone, but it's never on because I
25 have not been able to pursue what I wanted to do.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 17

01 Q And what's that?

02 A I would like to start at the competitor
03 business.

04 Q So, the phone number 4620 you intend to use
05 or you hope to use in a business that competes with
06 SeaWater Pro?

07 A Yes.

08 Q And is that through the company Watermakers
09 and Desalination LLC, that you registered with the
10 State of Florida on January 9th, 2024?

11 A I believe that's the correct date, but yes.

12 Q Okay. What's the -- where does the business
13 operate from?

14 A On Automotive Bay at 1314 Southwest 1st
15 Avenue Bay 1.

16 Q And do you have any business partners or
17 other owners?

18 A Absolutely not.

19 Q Is that company currently in operation?

20 A It's not really active, no. The shell is set
21 up.

22 Q I'm sorry?

23 A The shell is set up.

24 Q When you say the shell is set up, what does
25 that mean?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 18

01 A I have all of my paperwork in order and I've
02 only received very little stock.

03 **Q Have you marketed a product?**

04 A Not officially, no.

05 **Q You say not officially. What does that mean?**

06 A There's no website at the current time. It's
07 just been word of mouth.

08 **Q Anything on social media?**

09 A I have set up an account on Facebook and on
10 TikTok.

11 **Q Have you posted on Facebook or TikTok about**
12 **this company Watermakers and Desalination?**

13 A As far as the business being in business?

14 **Q Well, I mean, you can establish a page or --**

15 A I've got the page named, but I haven't put
16 anything really on it.

17 **Q No content at all?**

18 A Very little.

19 **Q What about TikTok posts? Have you posted on**
20 **TikTok about this business?**

21 A Very little.

22 **Q And the posts on Facebook and TikTok, those**
23 **would be on the Watermakers and Desalination LLC, page**
24 **or your personal?**

25 A On Facebook, I've only created the shell for

01 Watermakers and Desalination LLC, just a page. I
02 haven't been -- I haven't poke -- made a post on
03 Facebook since, I believe April of this year on my main
04 page.

05 Q Okay. And then, what about on TikTok?

06 A On the Watermakers and Desalination page,
07 I've got maybe three silly videos of about being a
08 liver board on my personal TikTok. I have done a brief
09 series about tips and tricks with Watermakers.

10 Q And the brief series about the tips and
11 trips -- tricks of on Watermakers on your personal
12 TikTok, when did you start posting those?

13 A I believe last summer, I'm not sure.

14 Q Last summer, meaning the summer of '24 or the
15 summer of '23 as we're in the beginning or
16 January of '25, so I think we're on that.

17 A Yeah. I -- shoot, I really would need to
18 check the exact date, but it would've been 2024, I
19 believe.

20 Q Okay. And then you said, when you were
21 talking about your Facebook, the Facebook page, you
22 said there's -- it's just a page, no posts since April
23 of '24 on the main page. Were your -- were there other
24 pages that have other content on Facebook? And just
25 because you said main page, so I just wanted to

01 picture --

02 A Sure. I've got -- basically I have my main
03 Facebook page and then the other pages that are set up
04 that are kind of like chapters. I have like a one for
05 my Pilates, one for my Salty Blue Fun business, one of
06 the Watermakers business. That's why. So, there may
07 be posts, but it wasn't necessarily had anything to do.

08 Q Okay. Hold on one second. Need a second.
09 For the Watermakers and Desalination, you said it's not
10 really active. The shell is set up, it has paperwork
11 in order. And then we talked about the Facebook kind
12 of chapter on your main page. Is it actively selling?

13 A No.

14 Q Have you made any posts on Facebook or
15 YouTube or TikTok or Instagram offering to sell
16 Watermakers?

17 A Yes.

18 Q And as far as the offers to sell Watermakers
19 on any of those social media platforms, have those been
20 made since, I don't know, let's say the summer of 2022?

21 A I'm sorry. Can you repeat the question?

22 Q Yeah. Since the summer of 2022, because you
23 said that on your social media you have made offers to
24 sell Watermakers, and I'm just trying to figure out a
25 timeframe for when that's occurred. Has that been

01 since the summer of '22?

02 A No.

03 Q Okay. So, regardless of whether it's for the
04 company that is or was to become Watermakers and
05 Desalination or personally since the summer of '22, you
06 haven't offered to sell any Watermakers on social
07 media. Is that correct?

08 A No.

09 Q Okay. Can you explain to me about how or why
10 that statement is incorrect?

11 A I have made offers to sell and a few
12 customers have approached me and I explained that I was
13 just starting this business.

14 Q And so, am I correct the only offers that you
15 made were in connection with a product that was to be
16 sold by Watermakers and Desalination, but wasn't?

17 A Has not.

18 Q Okay. Let's see, for the two phones that you
19 use actively, which would be the 1968 number and the
20 0840 number?

21 A Yes.

22 Q Were those both iPhones?

23 A No.

24 Q Either of them an iPhone?

25 A No.

01 Q Have you changed either of those phones since
02 the summer of 2022?

03 A Yes.

04 Q When was the last time that you changed or
05 upgraded the 1968 phone?

06 A 1968, it was in August, I believe, of 2023.

07 Q Was that just an upgrade for a new phone, was
08 the phone broken?

09 A That was a free upgrade.

10 Q Was that the only time that the phone was
11 changed since the summer of '22?

12 A That phone?

13 Q Correct.

14 A Yes.

15 Q Okay. And then 0840?

16 A Yes.

17 Q You guess that phone's been changed since
18 December of '22?

19 A Yes.

20 Q When was the last time that that phone was
21 changed?

22 A Also in 2023 August.

23 Q Was that also for free upgrade?

24 A Yes.

25 Q And for the 1968 phone, did you lose any text

01 messages or e-mails during the upgrade process?

02 A Not for the 1968.

03 Q What about for the 0840, you lose e-mails or
04 text messages in the upgrade process?

05 A I actually had a -- my phone died and I did
06 lose all my text messages.

07 Q What about e-mails, were you able to use --
08 the e-mails would've synced with your online account,
09 right?

10 A I believe so.

11 Q Okay. And since let's say June of 2019, what
12 e-mail addresses have you used?

13 A Personal?

14 Q Sure. We can start with there.

15 A I have mindytubbert@gmail, I have
16 mindytubb@gmail, I have Pop Pilates with Mindy and
17 Pilates with Melinda @gmail. I had a
18 sellitmindy@gmail. I had a meight -- M-E-I-G-H-T
19 4me@gmail.

20 Q The Sellit -- it was Sellit S-E-L-L-I-T?

21 A S-E-L-L-I-T, Mindy, that was primarily when I
22 was selling stuff on Craigslist. I compartmentalized
23 my activities. And I'm sure there's a couple that I'm
24 forgetting, but I really didn't use in my primary e-
25 mail, which that Mindy Tubbert.

01 Q And what were you selling on Craigslist with
02 Sellit with Mindy -- sellitmindy@gmail.com.

03 A Just use items throughout the house.

04 Q And when was that? The timeframe?

05 A When I met Mike in 2015 and then I sold some
06 items off the boat throughout 2022, '23 and '24. Well,
07 that is primarily off Facebook marketplace.

08 Q Did you have any e-mails that you've used for
09 work in the past since 2019, other than I'm guessing
10 the Pilates with Mindy or Pilates with Melinda?

11 A You're absolutely right. I have. Now I
12 think since you said that I've got Salty Blue Sales,
13 S-A-I-L-S and S-A-L-E-S. And then I did set up the
14 Watermakers and Desalination and
15 watermakersllc@gmail.com.

16 Q Salty Blue Sales, S-A-L-E-S, S-A-I-L-S, and
17 then you said Watermakers?

18 A And Desalination.

19 Q Is it and, or an ampersand?

20 A It is and.

21 Q And what else?

22 A And watermakersllc@gmail.

23 Q And Watermakers and Desalination, is it LLC
24 at the end of that one or no?

25 A I believe so.

01 Q Any other work e-mails that you've used?

02 A Not that I can think of.

03 Q Was there a work e-mail that was assigned to
04 you from SeaWater Pro?

05 A No.

06 Q Did you use any e-mail addresses from
07 SeaWater Pro?

08 A Yes.

09 Q Which e-mail addresses were those?

10 A SeaWaterProllc@gmail.com.

11 Q And when was that?

12 A Also there was the mike85233@gmail.com. And
13 a little bit off p19mike@gmail.com.

14 Q And what?

15 A p19mike@gmail.com.

16 Q And you would've used all those for work?

17 A Yes.

18 Q From SeaWater?

19 A Yes.

20 Q Okay. And for the SeaWaterProllc@gmail.com
21 address, when would you have used that?

22 A It was on my phone. It was at work.

23 Q Okay. And so, during what timeframe would
24 you have used that e-mail address?

25 A From when the business started in 2017 until

01 2022.

02 Q And for e-mails that you would have sent from
03 that e-mail address, would you write your name at the
04 bottom or how would we know that it was sent from you?

05 A Put my name at the bottom. Sometimes I would
06 put Mike if he instructed me to do so. I was aware the
07 bookkeeper always put Mike's name.

08 Q You said you were aware that the bookkeeper
09 always put Mike's name?

10 A When she returned texts or e-mails to
11 customers.

12 Q Okay. And so even though the bookkeeper
13 always put Mike's name, when she returned e-mails to
14 customers --

15 A Not always, but quite a few.

16 Q Even though the bookkeeper would put Mike's
17 name on quite a few e-mails when she returned e-mails
18 to customers, you would do it sometimes when Mike would
19 in -- if Mike would instruct you to do so?

20 A If Mike would instruct me to do so or if it
21 was just -- maybe a pleasantry.

22 Q What do you mean by that?

23 A Thank you for your business. We appreciate
24 it.

25 Q So, if it was just a quick response thanking

01 somebody or for their business or a comment on social
02 media or something, then you would just do a quick.
03 Thank you so much. We appreciate it, Mike, you know --

04 A Yes.

05 Q -- takes a minute or two, something like
06 that.

07 A Yes.

08 Q You said it was on your phone and at work.
09 So, which phone was the seawaterprollc@gmail address,
10 you tied to which phone number I should say?

11 A (913) 710-0840.

12 Q And then you also said that you would use it
13 at work. Was there a specific work computer that you
14 would use?

15 A Yes.

16 Q Okay. At -- so, you would use a specific
17 computer at SeaWater Pro, when it was located where?

18 A I -- it might not be a specific computer, I
19 tended to use one computer in particular, but there
20 were two computers at the front desk and then there
21 were computers upstairs in the office when he moved to
22 the office.

23 I very rarely used his computer that was on the
24 warehouse floor when he was doing work there. I would,
25 it wasn't like I couldn't, but a lot of times he would

01 have his other stuff set up.

02 Q Okay. So, which computer in particular would
03 you normally use, you said there were two -- at the
04 front. I think you said there was one upstairs and
05 there was one in the warehouse. And then Mike would
06 use the one?

07 A Upstairs when he was on the warehouse floor
08 for when we initially moved to the warehouse, that
09 particular warehouse, the one at 3233 Southwest 2nd
10 Avenue. But he decided to go up to the area that I
11 called the Nest because of the noise from the CNCs.

12 Q So, Mike had -- Mike would use two computers,
13 one would be upstairs and the Nest, and one would be --

14 A No, he use -- he took the one downstairs to
15 the upstairs at the - when he moved to the Nest.

16 Q Was it a laptop or a desktop?

17 A He always uses laptops.

18 Q Okay. And where would you be set up at?

19 A Reception area.

20 Q And you said there were two computers in
21 there?

22 A Yes, I primarily used one computer there.
23 And when the bookkeeper moved in, she used the other
24 computer.

25 Q During what timeframe?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 29

01 A As far as --

02 Q That you were using the computer at the 3233
03 Southwest 2nd Avenue warehouse address?

04 A I -- from the day that we moved there until
05 the beginning of March of 2021.

06 Q Okay. Why did you stop using the computer at
07 the reception area of the warehouse in March of '21?

08 A Mike had pulled Bailey into the day-to-day
09 operations, and I had -- I wasn't willing to work with
10 Bailey and the way that she wanted to run the business.

11 THE COURT REPORTER: Bailey -- B-A-I-L-E-Y?

12 THE WITNESS: Yes.

13 BY MR. POLLOCK:

14 Q What was Bailey's position at the time?

15 A Bailey originally was hired to just ship
16 boxes.

17 Q Okay. And then at that time, let's say in
18 March of '21, what was she doing?

19 A Packing boxes.

20 Q And so, you weren't willing to work with
21 Bailey in the way that she packed boxes?

22 A I wasn't willing to work. I did not want to
23 hire Bailey. And the drama that she created within the
24 shop when Bailey had come to visit, we had made an
25 agreement that Bailey would not be hired, but my son

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 30

01 quit and my -- and Mike hired her out of spite that
02 day.

03 Q I just want to unpack this a little bit.
04 Bailey is your niece?

05 A Yes.

06 Q And Bailey had come to visit?

07 A Yes.

08 Q Was she staying with you at the time or was
09 she staying elsewhere?

10 A She was staying with us.

11 Q When you say us, you're -- you and Mike?

12 A Yes.

13 Q And you would -- so you had an agreement with
14 Mike that he was not going to hire Bailey?

15 A Mike actually said it first that Bailey was
16 not to be hired because my son was actually working
17 there at the same time.

18 Q And was there an issue between Bailey and
19 your son?

20 A I'm not. I am not actually sure what
21 happened the day that my son quit.

22 Q Okay. But you said that Bailey was not to be
23 hired because your son was working there at the same
24 time. And I'm trying to find out if there was an issue
25 of hiring Bailey because of your son?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 31

01 A We had worked with Bailey prior for a short
02 time in the business, and Mike knew that she was coming
03 down here to probably move back in, but he allowed her
04 to come for a visit.

05 Q Okay. And so, which -- your son -- which son
06 was working there?

07 A The Dylan with the Y, we had two Dylan's.

08 Q Okay. And for some reason, Mike didn't want
09 Bailey working at the same time as Dylan?

10 A No, he did not want Bailey working there at
11 all.

12 Q Okay.

13 A At that time.

14 Q Did you care if Bailey worked there or not?

15 A Absolutely.

16 Q Okay. And what were your thoughts on it?

17 A The first week, Bailey was there on her
18 vacation. She not only slept with a guy on the floor,
19 in the shop, she also slept with our neighbor. She has
20 too -- problem with alcohol on top of everything.

21 Q For how long did Bailey work at SeaWater?

22 A At what point.

23 Q You said that she worked there for a short
24 time in the business?

25 A Yes.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 32

01 Q So, let's start with that. When did she work
02 for that short period of time?

03 A She worked for a matter of, I believe she
04 started in January of 2019. And then she was always
05 gone at least every third week. She went back, she
06 went to for a spring break. She quit college.

07 She had never attended a class, but still went to
08 spring break and then did not come back. She went
09 straight back to Kansas because of COVID standards.
10 Which was a blessing.

11 Q So, that was March --

12 A -- of 2019. She missed several days because
13 she was too drunk to show up.

14 MR. CUTHBERTSON: Can you guys continue on
15 that in for a minute?

16 MR. POLLOCK: Yeah, of course.

17 BY MR. POLLOCK:

18 Q Okay. And then you said she worked there and
19 she did another stint at SeaWater Pro. When was that?

20 A She started when I left the day-to-day
21 operations in March of 2021.

22 Q What do you mean by the day-to-day
23 operations?

24 A I primarily went to work just evenings with
25 Mike. I went in on a few days and occasions.

01 Q And what do you mean by day-to-day
02 operations?

03 A I would go in and I would, like, I went in
04 one time and I saw that they were not, they were
05 doing -- inventory was way out of control. They were
06 expressing everything in. I also watched where Bailey
07 did no geography.

08 So, instead of sending product to the US Virgin
09 Islands, she would send it to St. Thomas. And that had
10 a more than four times the rate for shipping. She was
11 bypassing the accounting system. She wasn't entering
12 the receivables into the accounting system.

13 She was inappropriate with handling the employees.
14 She -- as she used the term -- oh, we don't need to go
15 on that. She would have -- there would be an incident
16 where there would be two bad panels.

17 Instead of looking at the timeframe that the
18 panels were stolen, she would shut down the line to
19 have a discussion about these two panels when one
20 panel, the customer was notorious for kind of tinkering
21 with the system.

22 And then the other panel was actually due to
23 adapter that had been cast instead of machined, you
24 know, six people not doing anything to have these
25 ridiculous meetings.

01 And on top of it, Mike -- it got to a point where
02 Mike had to tell her to stop sleeping with people in
03 the shop or in the business.

04 And Bailey would insist that Mike was to co-sign
05 leases for employees. And these employees -- I was
06 never allowed to fire an employee, at Mike's directive.
07 He -- even if they refuse to show up until 11:00 or 1
08 o'clock in the day, if they bothered to show up.

09 Q And so, as far as day-to-day operations,
10 what, I mean, what was your responsibility or what did
11 you do, you indicated that in March of 2021, you know,
12 you left these day-to-day operations. So, what were
13 the day-to-day operations that you were handling up
14 until then?

15 A I -- my duties and responsibilities started
16 from the beginning of the business. It could be as
17 simple as sweeping to setting up shelves, but at that --
18 as the business grew so did all my responsibilities.

19 It was, there was inventory, purchasing shelving
20 or, you know, getting it in, putting them on the
21 shelves, building pre assem -- excuse me, building pre-
22 assemblies to building units to shipping, to managing
23 customers, to paying payables to payroll, to managing
24 the employees, to selling units when customers came in
25 to doing trade shows, setting them up and tearing them

01 down.

02 And also all the social media accounts, which
03 became astronomical at times. I tended to do the
04 social media more at night, at home.

05 Q So, purchasing, you said that that was one of
06 your day-to-day operation, operational responsibilities
07 you had until March of '21. When did you handle
08 purchasing from when to when?

09 A During the daily -- it was just part of the
10 daily activities. I would also run to -- I would run
11 to a vendor to pick up -- local vendors to pick up
12 items also.

13 Q I mean --

14 A It depended what every day we got up, Mike
15 would give me a list of duties and responsibilities.

16 Q Would he give you a physical list, handwritten
17 list of things that you had to do?

18 A No.

19 Q Okay. So, when you say that Mike would give
20 you a list of responsibilities, what do you mean by
21 that?

22 A Whenever Mike and I were together, because
23 you will notice that he's on the phone all the time.
24 He would tell me that I would need to send a pump to
25 somebody. I would usually input that in my phone to go

01 in to do the next day.

02 When we have the online orders come in, I knew how
03 to go in and process the order and get it, built and
04 shipped. If, you know, when he was talking to a
05 customer on the phone, if there was something that --
06 special that needed to be done or if he knew a customer
07 was coming into the shop, I had to have an order ready
08 for their pickup.

09 Q Okay. You had a shipping department, right?
10 I mean, there was a shipping department at SeaWater Pro
11 during the last couple years that you were there while
12 they were in this warehouse, the 3233 warehouse. Is
13 that right?

14 A Yes.

15 Q Okay. And so, when you say that you would
16 tell her to send a pump to somebody to do the next day,
17 your responsibility was what, to tell the shipping
18 department to get the pump and send it out?

19 A Yes, with a -- an exact address. A lot of
20 times cruisers, when you're shipping a part out, it
21 doesn't go to their home, it's going to a different
22 port or location.

23 Q Okay. I mean --

24 A Especially international shipments, it was a
25 much different process than national shipments.

01 Q And for a shipping department at SeaWater
02 Pro, I mean, correct me if I'm wrong, but it seems like
03 they'd be pretty familiar with shipping to
04 international addresses to meet up with vessels, right?

05 A I was the only one shipping it until my son
06 came.

07 Q And your son came when?

08 A My son came the last four months that he was
09 there, November of 2019 to February, the end of
10 February of 2000 -- no, '20.

11 Q Okay.

12 A 2000 or -- no, 2000 -- I'm sorry. He came
13 2020 to '21.

14 Q So, your son came November of 2020 until the
15 end of February of '21?

16 A Yes.

17 Q Okay. And then talking about Bailey, you
18 said that she was there working January of '19 until
19 March of 2019 for COVID, but was in --

20 A She was only part-time and she was gone
21 multiple weeks at a time.

22 Q COVID was March of 2020.

23 A Okay. I'm all -- but it would've been 2020
24 then. I'm sorry.

25 Q Okay. So, Bailey would've been there from

01 January to March of 2020?

02 A Yes.

03 Q Okay. And then --

04 A I'm sorry.

05 Q And then you talked about how as the business
06 grew, so did your responsibilities, and so I want to
07 get back to that. So, before your son started working
08 for SeaWater Pro, you're saying that there was no
09 person other than yourself who was responsible for
10 shipping out items?

11 A Yes. Mike was selling over \$100,000 a month
12 just with the two of us. I could build and Ship 60
13 units day as long as it didn't have a panel with the
14 old housings by myself.

15 So, I needed to make sure that I had the
16 inventory, it was on the shelf that I had my pre-
17 assemblies done then to do the housings.

18 Q And then didn't Mike hire people to start
19 building the pre-assemblies and the units?

20 A Eventually.

21 Q Okay.

22 A It's -- I was still doing it though. Like I
23 said, Mike didn't have a set time for a lot of those
24 people to show up if they bothered to show up. The day
25 that I got frustrated, and left when -- my son came in

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 39

01 the next day and Bailey said that he would -- she would
02 help my son.

03 I had done inventory that morning and I went back,
04 and one of the employees said we didn't have inventory
05 and he had pulled that stunt with me before he would
06 hide the inventory so that they didn't have to work.
07 Had six people sitting there doing very little.

08 Q All right. So, do you remember when the
09 business moved into the 3233 Southwest 2nd Avenue
10 warehouse?

11 A Yes.

12 Q When was that?

13 A That was in let's see, 2018 is when I got
14 married which we moved into the other house 2019.

15 Q Just warning --

16 A 2020 --

17 Q When you talk out loud --

18 A Oh, I'm sorry.

19 Q -- she has got to take it all down. So, if
20 you want to think.

21 A Yes. It was in July of 2020 -- I believe
22 2 -- it was in July. I remember it was in July, 2000 --
23 I believe it was 2020.

24 Q Okay. And in moving into that warehouse in
25 July of 2020, it was a bigger space than what SeaWater

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 40

01 Pro had occupied up to that point. Is that right?

02 A Yes. We rent a 1,200 square foot warehouse
03 at that time, and we moved to a 7,000 square foot
04 warehouse. At the time that we moved, we had three
05 employees.

06 Q And who were those employees?

07 A Mike -- well, Mike was one. I was an
08 employee, and Trevor Pledger.

09 Q And then when -- so you were moved into the
10 new warehouse, it did so to have more inventory and to
11 have more employees. Is that right?

12 A Absolutely.

13 Q So --

14 A Mike doubled that business every six months
15 when I was there.

16 Q Okay. And so, when SeaWater moved from the
17 1,200 square foot warehouse to the 7,000 square foot
18 warehouse, that was to accommodate more inventory and
19 more employees and more production. Is that right?

20 A Yes.

21 Q And also to have a display area in the front
22 of the warehouse, right?

23 A Yes. As the business grew, so did all my
24 duties and responsibilities grew. We worked all the
25 time.

01 Q Did you first come to Florida with Mike,
02 before Mike?

03 A Yes.

04 Q Was it with or before?

05 A That -- I met Mike in Phoenix. Shortly after
06 I met Mike, he requested that I move into a warehouse
07 with him. Due to his heart failure, he's -- he has
08 good days and bad days. During that first year, Mike
09 had five Cath Labs.

10 He had an ablation, he had his gallbladder removed
11 and he had his defibrillator replaced with a three lead
12 pacemaker along with an accidental overdose from a
13 pharmacist. He got down below 135 pounds. I cashed
14 out my retirement and bought an RV.

15 He left his business there. And we went to San
16 Diego to find the boat. Didn't find a boat there and
17 it was cold. Went down the coast or hug the -- hugged
18 the Gulf Court coast the entire time. He was getting
19 stronger. Once we got to Fort Lauderdale, sold the RV
20 and bought the boat with my retirement.

21 Q Have you worked anywhere else since moving to
22 Florida?

23 A Yes.

24 Q Where else work -- where else did you work?

25 A LA Fitness and Lifetime Fitness, along with a

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 42

01 couple of small studios.

02 Q Okay. Which LA Fitness have you worked at?

03 A Oh goodness. I've worked at the location off
04 of 17th Causeway. I've looked at -- worked at the
05 Pompano location, the Oakland location. I've worked at
06 Coconut Creek, I've been at Sawgrass Mills.

07 I've also worked at Sunrise. I've worked at
08 Miami -- my -- has a different name. It's the northern
09 part of Miami Aventura. I was the location at Cypress
10 Creek, also went out to -- in the bus -- or in -- I
11 don't recall the name of it -- the Plantation. And
12 then there was another street that started with a P in
13 a club off University.

14 Q Pine Island, possibly?

15 A What?

16 Q Pine Island?

17 A Pembroke.

18 Q Pembroke Park --

19 A Pembroke Pines.

20 Q And you would've worked at all of these
21 between 2019 and the summer of '22?

22 A No.

23 Q Okay. What should you have worked at between
24 2019 and the summer of '22?

25 A Mike allowed me to teach three classes off

01 17th after that he needed me and requested that I be at
02 the business.

03 Q Okay. So, is it your testimony that between
04 2019 and the summer of 2022, you'd only worked -- you'd
05 only taught three classes?

06 A No.

07 Q Okay.

08 A When COVID hit, I -- the gym shut down and I
09 did not return till later, much later.

10 Q Okay. You said that Mike let you teach three
11 classes off of 17th Street, then requested you be at
12 the business. And I'm talking about the timeframe from
13 2019 until the summer of 2022.

14 So, between the sum -- between the timeframe of
15 2019 and the summer of '22, how many classes or how
16 often would you teach at Lifetime Fitness -- excuse me,
17 LA Fitness?

18 A I only taught three if there wasn't a trade
19 show or something else that came in the way.

20 Q When you say you would teach three classes
21 that would be three classes a week?

22 A Um-hum.

23 Q That's a yes?

24 A Yes, it is.

25 Q Okay. And these classes would be taught at

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 44

01 what time?

02 A There was 09:45 that I would ride my bike to
03 and then go straight to the shop. And at that time, at
04 least four times a week, he had customers waiting
05 there -- or I'm sorry, not a week.

06 At least four times a month there would be
07 customers waiting there for me to pack boxes for them
08 for their orders. But I did that on Tu -- the 09:45
09 was Tuesday and Thursday and then 04:30 on Tuesday
10 night, which I actually ended up giving up.

11 Q When did you give that up? The Thursday
12 night --

13 A I don't recall the exact -- honestly, I think
14 I did give that up before 2019.

15 Q Okay. And then the Tuesday, Thursday
16 mornings, the 09:45 you would teach those, I mean, from
17 2019 all the way to 2022 other than COVID?

18 A No, no.

19 Q Okay. When did you teach those?

20 A When COVID came in, they shut down the gym
21 and I -- that's when I stopped.

22 Q Okay. So, you would only have -- you
23 would've only worked teaching at LA Fitness through
24 March of 2020?

25 A No. COVID was 2020.

01 Q Okay.

02 A Yeah. So, it was March -- or it was -- I'm
03 sorry.

04 Q So, maybe I misspoke and said COVID. So,
05 you've only taught at LA Fitness through March of 2020,
06 which is when COVID started the middle of
07 March of 2020. Is that correct or is that not correct?

08 A Is -- that's not correct. Now, that I think
09 about it, I believe I -- because I do not recall
10 driving my bike from the club to the new warehouse.
11 The other warehouse, yes. Well, and COVID started when
12 we were in the other warehouse. So -- okay. It
13 would've been March of 2020.

14 Q Okay. So, going back to my question, is it
15 correct that you would've taught at LA Fitness through
16 March of 2020?

17 A Yes.

18 Q And that would've been on Tuesday and
19 Thursday mornings at 09:45 because you gave up the
20 Thursday nights sometime before 2019?

21 A Yes.

22 Q Okay.

23 A Unless Mike had asked me to be there for a
24 customer or if there was a trade show, I was getting in
25 trouble at LA Fitness because of how many days I had

01 missed.

02 Q What was your payment arrangement with LA
03 Fitness?

04 A 25 an hour.

05 Q And did they pay you as an independent
06 contractor or as an employee?

07 A W2.

08 Q So, that would be an employee?

09 A Yes.

10 Q And you've received W2s from them?

11 A Yes.

12 THE WITNESS: Is there any way we could take
13 a break?

14 MR. POLLOCK: Sure.

15 THE WITNESS: Okay. Thank you.

16 (Thereupon, a short discussion was held off
17 record.)

18 (Deposition resumed.)

19 BY MR. POLLOCK:

20 Q Okay. So, we talked about working at LA
21 Fitness, and then you said that you started working at
22 Lifetime. Would that have been after?

23 A No, that was when we first rec -- arrived
24 here in Florida.

25 Q You started working at Lifetime Fitness when

01 you first arrived in Florida?

02 A Um-hum.

03 Q Is that a yes?

04 A Yes. I'm sorry.

05 Q Did that continue through the summer of '22
06 working at Lifetime?

07 A No.

08 Q When did you stop working at Lifetime?

09 A I stopped working at Lifetime in 2018.

10 Q You also mentioned that you were -- you had
11 instructed small studios. Did you continue instructing
12 at small studios through '22?

13 A No.

14 Q When did you stop working at small studios?

15 A Prior to 2018.

16 Q Did Lifetime restrict your -- excuse me. Did
17 LA Fitness restrict your ability to work for other
18 fitness studios?

19 A No.

20 Q And so, when you would bike from where you
21 were living with Mike to LA Fitness, then you said you
22 would bike from LA Fitness to, it would be the smaller
23 warehouse, the 1,200 square foot warehouse?

24 A Yes. Mike and I lived on Mila until 2000 --
25 we moved into the condo during COVID, later on into

01 COVID.

02 Q Okay. And then, but you would bike from LA
03 Fitness to the smaller 1,200 square foot warehouse?

04 A Yes.

05 Q All right. Besides the work at LA Fitness,
06 then you told us about Watermakers and Desalination.
07 Then you have Salty Blue Fun, which you opened in
08 January of 2024?

09 A Yeah. Let me think this '23. I opened it in
10 '23.

11 Q Okay. What does that company do?

12 A Small paddleboard rentals, small boat
13 rentals. I also rent electric bikes. I no longer have
14 kayaks and from time to time I do a charter.

15 Q Any other owners partners in that business?

16 A No.

17 Q Before you met in Phoenix, what did you
18 retire from doing?

19 A I was still working.

20 Q Okay. Because you said that you had cashed
21 out your retirement to buy an RV. I wanted to find
22 out.

23 A I cashed out my retirement as I was working.

24 Q And what year was that you met Mike, was that
25 in 2015?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 49

01 A Yes.

02 Q When did you divorce from Mr. Tubbert?

03 A 2015.

04 Q Were you living in Phoenix or somewhere else
05 when you divorced?

06 A Phoenix.

07 Q How long had you two been married?

08 A 25 years.

09 Q How many children did you have together?

10 A We have three children.

11 Q What are their names?

12 A Francis Tubbert V, goes by Quentin,
13 Nicholas Edward Tubbert and Dylan Michael Tubbert.

14 Q Any of them live here in South Florida?

15 A I am sorry, I didn't --

16 Q Any of them live here in South Florida?

17 A No, not at this time.

18 Q How about during the past five or six years?

19 A Dylan lived here.

20 THE COURT REPORTER: Okay. Just to confirm,
21 your Dylan is D-Y-L-A-N?

22 THE WITNESS: Um-hum.

23 BY MR. POLLOCK:

24 Q When did Dylan live here in South Florida?

25 A Was October or November of 2020 to -- wait a

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 50

01 minute. COVID was 2020, right? 2020.

02 Q Correct.

03 A To '21.

04 Q Would that have been to March of '21?

05 A Yes.

06 Q And to your knowledge, was he an employee of
07 the business?

08 A I'm sorry, I missed that.

09 Q Was he paid as an employee of the business?

10 A Yes, he was.

11 Q What was his job title or job duties or
12 responsibilities?

13 A He shipped product, but he also built units
14 and stock shelves. He also would run the CNCs.

15 Q Did Dylan have any background in engineering
16 or anything that would've given him prior knowledge
17 about building or shipping these Watermakers?

18 A He has a hard work ethic. He had actually
19 come out when we moved the business. And Mike was
20 impressed with -- how quickly and how he moved and how
21 hard he worked.

22 Q Okay. Besides Dylan Tubbert, your son, and
23 besides Bailey, were there any other family members of
24 yours who worked at SeaWater?

25 A No.

01 Q While Dylan was here in South Florida working
02 at SeaWater, did he live with you and Mike?

03 A Yes.

04 Q Was that on the boat or was that in an
05 apartment or both?

06 A That was in the condo.

07 Q While Dylan was here in South Florida working
08 at SeaWater, did he ever have his own place, his own
09 apartment condo?

10 A No.

11 Q Okay. And you mentioned that Bailey had
12 lived with the two of you while she was working at
13 SeaWater or no?

14 A Yes.

15 Q Did Bailey live with you and Mike the whole
16 time that she was at SeaWater?

17 A No.

18 Q When did she move out?

19 A She moved out in 2000 -- I believe in the
20 spring -- or no, it was close to summer of 2021, I
21 believe.

22 Q What did Bailey do at SeaWater?

23 A She eventually came in -- she stopped doing
24 shipping, she was just processing the orders.

25 Q So, we talked about Bailey working at

01 SeaWater twice, one from January to March of 2020?

02 A And she sleep on the boat with us at that
03 time, it was part-time work.

04 Q Okay. And then again from March of '21 until
05 the -- until -- and then she moved out with you -- from
06 you in the summer of '21. Is that right?

07 A No, she was with us longer than that because
08 we moved from -- when we lived at the condo, she was
09 there. When we moved to the house, she lived there a
10 few months and then finally left.

11 Q Okay. So, when were you at the house?

12 A Let me see. It was in '20, let's see, '21.
13 She -- we were in the house of 2 -- the last house we
14 had moved in, that was April of 2022. So, she was
15 there with us till 2 -- in 2021.

16 Q So, Bailey was with you from 2 -- sometime in
17 '21 until April of 2022 when she moved out?

18 A Yes, I believe so.

19 Q Okay. And you said Bailey stopped doing
20 shipping, was processing orders. When Bailey was
21 working the first time from January to March of 2020,
22 what was she doing?

23 A She was doing some pre-assembly work.

24 Q And to your understanding, Bailey was paid as
25 an employee by SeaWater?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 53

01 A The first time that she was there, she was
02 getting paid hourly.

03 Q Okay. Do you know what -- do you agree that
04 she was paid as an hourly employee?

05 A Yes, she was.

06 Q Okay. And then when she came back, you said
07 in March of '21?

08 A Yes.

09 Q And you left SeaWater -- you left Mike in
10 December of 2022. Do you -- was Bailey still working
11 at SeaWater when you left Mike in '22?

12 A I believe so.

13 Q Do you know if Bailey's still working at
14 SeaWater?

15 A I do not believe so. I know that Mike and
16 Bailey had several arguments and she would post online
17 how she had quit. I also know that Mike had told me
18 that various occasions she would make of -- she would
19 go surfing on Monday mornings instead -- from a door,
20 had lessons.

21 Q Was she giving lessons or taking lessons?

22 A Taking lessons. And she was traveling quite
23 often. She was going to Bahamas, Costa Rica, Mexico.

24 Q And when Bailey was working at SeaWater from
25 March of '21 through whenever it was that she left, is

01 it your understanding that she was paid as an hourly
02 employee at that time as well?

03 A She was paid as hourly from what I
04 understood.

05 Q Hourly employee?

06 A Yes. And then Mike was giving her benefits
07 on top of it, primarily a brand new truck.

08 Q When Bailey moved out, did Mike pay for the
09 apartment?

10 A He told me he was going to.

11 Q Do you know one way or the other?

12 A I'm not sure.

13 Q Do you still keep in touch with Bailey?

14 A Absolutely not.

15 Q Why is that?

16 A Bailey not only -- Bailey disrespected me in
17 my own home and when she moved out she stole all kinds
18 of things.

19 Q Anything else? Any other reason why you
20 don't keep in touch with Bailey?

21 A I can't stand her sense of entitlement.

22 Q Did you threaten Bailey?

23 A No.

24 Q So you did not threaten her with a gun?

25 A Absolutely not.

01 Q Have you threatened any other employees at
02 SeaWater?

03 A No.

04 Q Do you have a gun?

05 A Not at this time.

06 Q What are the circumstances of you not having
07 a gun at this time?

08 A I had to relinquish -- relink or relinquish
09 my guns because of a cyber-stalking charge.

10 Q Who brought the cyber-stalking charge?

11 A Mike.

12 Q Have you ever been charged with a crime?

13 A Yes.

14 Q What was that?

15 A Cyber-stalking.

16 Q That was in 2022?

17 A Yes.

18 Q Now, what was your -- you said that we worked
19 all the time. So -- and then -- so, tell me what your
20 schedule was and then what it changed you for work?

21 A At what point in time? When COVID hit,
22 Mike's sales went through the roof. In the first two
23 months of that last year when I was in the day-to-day
24 operations of that business, he put on over \$1.4
25 million on the books.

01 Q Okay. And I was asking about your schedule
02 and then you told me when COVID hit and --

03 A We would generally go in around 09:00 in the
04 morning and work till about 06:00 in the evening. Some
05 evenings we wouldn't get out of there till 08:00.

06 I've got times where we were working at 02:00 in
07 the morning actually setting up making displays for
08 trade shows or for the reception area. If we weren't
09 at work, I was working on my phone. I was constantly --
10 excuse me, looking for reviews on social media.

11 Also, a lot of people would approach us that they
12 wanted free Watermakers and they were YouTubers. I
13 would see if I thought, if Mike would want them to
14 represent him.

15 Q Okay. So, you said you would go in from
16 09:00 a.m. and work until 06:00 p.m. during what period
17 of time? What timeframe, from when to when?

18 A Well, honestly, 06:00 was usually the
19 earliest we would quit because the phones would die
20 down. But after 06:00, and a lot of times we were
21 there till 08:00 because it was quiet time to just work
22 there.

23 On the weekends we might not go into the shop for
24 that extended day. Sometimes we absolutely did. Those
25 days tended to be a little bit shorter, but that was

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 57

01 still around 09:00 to 06:00. It was COVID. What else
02 were we going to do?

03 We had stopped going out, on the boat and doing
04 quite a few activities, but we would run out for dinner
05 and then we would go home and Mike would still be on
06 his phone, answering e-mails and I would be looking on
07 social media and then when he had told me that I needed
08 to make a note to get something done for the next day,
09 I would make a list of items that needed to be done.

10 Q Okay. And this workday from 09:00 a.m. until
11 06:00 or 08:00 or whenever it was, what period of time
12 was that your schedule from the beginning until
13 sometime in '21 or when was it?

14 A As the business grew, that also grew, you
15 know, in the evening hours we were also -- Mike would
16 be talking to India or an Australian dealer would be
17 calling or speaking to -- calling Mike and Mike would
18 put him on his speaker phone and we'd have to arrange
19 shipping and what items that he needed.

20 And certain, like, shipping motors to Australia
21 didn't make sense. So, the dealer had bought it and
22 Mike had given him money to buy the motors to keep on
23 his shelves to fulfill orders. There were just various
24 things like that.

25 Q Right. And I understand, but I'm trying to

01 find out, you said that you would work from 09:00 a.m.
02 until 06:00 or sometimes 08:00 or sometimes later.

03 A Yes.

04 Q And are you saying that that was the schedule
05 that you traditionally kept day in and day out from the
06 time Mike started SeaWater until the time that you
07 left?

08 A The days got longer as the more business we
09 received.

10 Q Okay. So, you're saying that as time went on
11 you were --

12 A Our days got longer.

13 Q Okay. And so, you said that you would work
14 from 09:00 a.m. until about 06:00 --

15 A That was when --

16 Q -- the things would die down and then, you
17 know, maybe it was 08:00, when was that?

18 A That was right before COVID that we were
19 putting in the longer days because it was just the two
20 of us when we had a -- when Mike sold over \$100,000, we
21 stayed until the work was done.

22 Q Okay. So, before COVID, so up until about
23 mid-March of 2020, that's when you would work 09:00
24 a.m. until about 06:00 p.m. or so, is that right?

25 A That's being very -- yeah, you could say

01 that.

02 Q Okay.

03 A We actually worked much longer, but --

04 Q And then you said you actually worked much
05 longer. I just want to know up to COVID, you told me
06 there was a schedule. Was the schedule 09:00 a.m.
07 until 06:00? Was it a different schedule? I just want
08 to know what you're claiming you were working up until
09 COVID.

10 A 09:00 to 06:00.

11 Q Okay. And then, after COVID, what did that
12 schedule change to?

13 A After COVID, I don't know when it -- when you
14 would say really -- when after COVID start -- stopped
15 because Mike was paranoid about COVID. We did very
16 little through that time. Even up until we left, he
17 wasn't going out in public too much.

18 Q Right. And that's because Mike had a bunch
19 of different health challenges, is that right?

20 A Yes.

21 Q Okay. And so, what was -- what are you
22 saying you worked -- you said until COVID, so COVID is
23 March of 2020.

24 A But we were putting in long orders before
25 2020.

01 Q Okay.

02 A Long days because we didn't have any other
03 employees.

04 Q All right. And then once you get to
05 March of 2020, what does your schedule change to?

06 A 2020, could be 09:00 to 07:00, if not 09:00
07 to 08:00. Sometimes Mike would lay down in a chair and
08 take a nap in the early evening due to his health
09 issues.

10 Q Okay. And so, what you're saying is from
11 March of 2020 until when did you work from 09:00 in the
12 morning until 08:00 at night?

13 A Monday through Friday, several days.

14 Q What do you mean Monday through Friday
15 several days? Is it every Monday -- weekdays all the
16 way through Friday or was it only several days during
17 the week?

18 A It was -- when COVID hit, it was pretty much
19 every day. And then we went in on the weekends also.

20 Q So, once COVID hit Mar -- mid-March of 2020,
21 you worked Monday through Friday, 09:00 a.m. to 07:00
22 or 08:00 p.m. and then you were also working weekends?

23 A Yes. I spent at least four hours a day just
24 on the phone with UPS trying to figure out which
25 countries were shutting their customs down so that we

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 61

01 wouldn't end up with products stuck in customs.

02 Because Italy shut down at one time. Spain was a
03 different time. Germany was another time. It was
04 chaos.

05 Q Okay. And that lasted for a couple weeks or
06 a couple months, right? That the COVID shutdowns
07 occurred?

08 A No, some of them were shut down for over four
09 months.

10 Q And during this time of COVID in March of
11 2020, when it was essential personnel only, were you
12 and Mike going to the warehouse or were you working
13 from home?

14 A Yes -- no, we were at the warehouse with
15 Trevor and we hired more people and Mike made a policy
16 that everyone that worked in the warehouse had to
17 have -- be vaccinated.

18 Q Okay. And this was before, let's say June of
19 2020?

20 A Yes.

21 Q Okay. And then did your schedule change
22 after June of 2020?

23 A No, business was still growing. And that's
24 also when we moved the warehouse. So, we have the
25 challenges of setting up the new warehouse, getting the

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 62

01 business up and keeping the sales and going out.

02 My son Dylan came to help move the warehouse and
03 then at that same time he moved us off of Mila into a
04 condo.

05 Q So, up until COVID -- so, up until that March
06 of 2020 timeframe, you were working 09:00 a.m. until
07 06:00 p.m. sometimes longer. What could we look at to
08 figure out when you started and stopped working each
09 day and what you were working on?

10 A We went to work every day.

11 Q Right. And my question was what would we
12 look at to see when you were working from when to when
13 and what you were doing during the day?

14 A Just our normal schedule. We got up between
15 07:30 and 08:00 every day. We would run, maybe have a
16 quick bite to eat, then we went directly into the
17 warehouse.

18 Q Okay. And that's what you're telling us.
19 And that's one way to do it. The other way is -- what
20 could we look at to see when you would start working,
21 what you would do during the day and when you would
22 stop working --

23 A Mike --

24 Q -- during this period bef -- up until COVID
25 started?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 63

01 A There's nothing that exists. Mike had -- the
02 timekeeping system did not come into play until
03 actually after my son left where the account set it up.
04 I have photographs of some days that would show some
05 time, some of a few videos, but for the most part that
06 was our daily life.

07 Q Right.

08 A And I always was with Mike and we were on --
09 in the car. We were taking phone calls. We were --
10 I -- Mike had actually given my car to employees and
11 customers to drive. So, I didn't even have access to
12 my own car.

13 We were always together. When he would drop me
14 off at the warehouse, he would leave in the car so that
15 he could answer his phone because the CNCs were whining
16 so loud. And he would go pick up ceviche and go to
17 Harbor Freight, which was annoying.

18 Q Okay. But as far as looking at things to see
19 when you would start and stop working --

20 A A tracking system does not exist --

21 Q Hold on. Let me ask my question. You're
22 saying there would be no e-mails up through COVID that
23 would have your name on them, which would show that you
24 were working on any particular day?

25 A There should be e-mails that exist,

01 absolutely.

02 Q And there's e-mails that would exist that
03 would show you working between 09:00 a.m. and 06:00 or
04 so p.m. up before COVID?

05 A There should be e-mails not only between
06 09:00 and 06:00, but after in the evening.

07 Q Okay.

08 A But like I said, I didn't always sign those
09 e-mails with my own name.

10 Q What about orders? So, if you were taking an
11 order, wouldn't your name appear as someone who took
12 the order if you were taking the order by phone?

13 A Not necessarily because most of the orders
14 were input on an online system. In fact, if you listen
15 to Mike on his phone calls, he will tell people to
16 place the order online.

17 There were some instances where we would e-mail an
18 invoice direct to the customer through Square or
19 Stripe.

20 Q Okay. And then if you were placing orders
21 for supplies to stock, wouldn't your name appear on the
22 invoice?

23 A Mike wanted to do a PO, purchase orders, once
24 the bookkeeper came there, there might be some there,
25 but really it was at that time just Mike and I did all

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 65

01 the ordering until -- and then Natalie did some
02 ordering too. But that was it. If any orders were
03 placed, it was with us.

04 Q Right. But I'm talking about ordering
05 supplies and when you order supplies from a supplier,
06 they'll send out an invoice. It'll have a name on it
07 along with the company. Would your name appear on any
08 of the orders that were placed with suppliers up
09 through March of 2020?

10 A I imagine so. I'm not sure.

11 Q Have you see -- did you see any?

12 A Normally when I gave a purchase order number,
13 it was the date. It was not my name. But the vendors
14 would testify that I placed orders.

15 Q How do you know that?

16 A Because I was approached by one vendor to --
17 they approached me to do a business together.

18 Q Which vendor is this?

19 A That is water -- what is the name of them?
20 Sorry. Their exact name -- I've got a brain fart. I'm
21 sorry. I don't -- give me a minute. It'll come to me.
22 It was Richard.

23 Q What parts or supplies does this company
24 provide?

25 A They did the nipples. They did the -- he's

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 66

01 no longer buying the pre-filter housings from them.
02 They supplied filters. They also supply the John Guest
03 adapters.

04 But you also had the gentleman that came from the
05 nickel-plated pumps by Comet, he came to the warehouse.
06 He would've seen me there at the warehouse. I talked
07 to him several times.

08 Also talked to the AR guy. He came into the shop.
09 He saw us working there. You also had the leasing
10 motor guys that came into the shop, but he saw me
11 working there.

12 I didn't order many of the motors though, to be
13 quite honest. You also had the guy that did the
14 Parker Hoses that came into the shop, which Mike
15 eventually started ordering a little bit from him.

16 But we also were buying a lot of stuff online. I
17 mean, even the guy, Jay from Baldotta, India came in.
18 He would actually stay at the shop. He stayed days at
19 the shop, actually.

20 THE COURT REPORTER: Could you spell
21 Baldotta?

22 THE WITNESS: B-L -- B-A-L-D-O-T-T-A.

23 BY MR. POLLOCK:

24 Q Have you spoken to any of these vendors that
25 you just identified since working with Mike?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 67

01 A Yes.

02 Q About what?

03 A Setting up my own business.

04 Q And you mentioned that Mike would -- that --
05 give your car to customers and employees to drive,
06 which employees were given your car to drive?

07 A Dillon, he had it for months.

08 Q Is that your son?

09 A No, my Dylan also drove it, but the other
10 Dillon.

11 Q How do you spell his name?

12 A D-I-L-L-O-N Stokes.

13 Q How often would that happen?

14 A He had my car for at least over three
15 months -- three or four months. I ended up taking the
16 car back and Mike did get upset at me because the next
17 day turned around and gave it to a customer for the
18 second time who had it for over four months.

19 Again, he had it three months prior to that who
20 actually happened to be a YouTuber for us. And I
21 believe the car is even pictured in some of his YouTube
22 videos.

23 Q For that car, Mike was paying the insurance
24 for it?

25 A Yes, for a while there I was solely covering

01 it. And then when I went to change insurance, I didn't
02 have my own check on it. It was out of the personal
03 account.

04 Q Okay. So, Mike started paying for the car
05 insurance for your car as of when?

06 A I would have to look back to check.

07 Q Before 2019?

08 A I believe I paid for it until sometime in
09 2019. Because I changed insurance when I was at the
10 1,200 square foot warehouse. But I was paying for it
11 myself before that.

12 Q And the car payments, was Mike making the car
13 payments on that or were there no car payments?

14 A Mike paid off the car, but there were no car
15 payments. But prior to that I was making all the car
16 payments.

17 Q When did Mike pay off the car?

18 A I'm not sure.

19 Q And that car was in your name?

20 A Yes.

21 Q Would Mike have paid off the car sometime in
22 2019 as well?

23 A 2018, I believe -- no, it would've been 2019.
24 In 2017 he gave it to another person to drive for eight
25 months.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 69

01 Q Do you still have that car?

02 A Yes, I do. I've incurred over \$11,000 worth
03 of damage, which will never be fixed. He himself
04 wrecked it and there were customers that spilled oil in
05 it. It's a mess. He's aware of it also.

06 Q Did you make any claims with your insurance
07 company?

08 A No.

09 Q When Mike paid off the car, about how much
10 did he pay off in debt for you?

11 A I don't recall the exact amount. It was
12 under \$3,000, I believe.

13 Q And your car insurance, how much was that a
14 month? Do you know?

15 A It kept rising up, but it was around -- I'd
16 have to look because I believe it was from \$150 to
17 \$168.

18 Q That was per month?

19 A Yes.

20 Q Okay. In addition, when you were living on
21 the boat at the slip, since 2019, was Mike paying for
22 the slip rental?

23 A At 2019 the business was doing well enough to
24 make all the payments. There were times where I had
25 made the payments out of my account, my personal

01 account when it couldn't pay. But at 2019, I believe
02 the business covered all of them.

03 Q In 2019, did SeaWater Pro have its own
04 separate bank account or did it share one with Mike?

05 A 2019, it had its own bank account.

06 Q So, in 2019, SeaWater Pro paid the slip
07 rental of the boat on which you and Mike resided. Is
08 that right?

09 A Yes. Also, where he did demonstrations for
10 customers.

11 Q And did the slip rental include electricity
12 and water or were those additional monthly payments
13 that had to be made?

14 A Included.

15 Q Then when you moved from living on the boat
16 in the slip to the Briny Apartment --

17 A No, there were two other residences before
18 that.

19 Q Okay. And for those two residences, between
20 were those both apartments?

21 A No.

22 Q House and apartment, what were they?

23 A Condo and house.

24 Q Were you on the lease for either the condo or
25 the house?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 71

01 A For the condo I believe I was, for the house
02 I'm -- I was listed as residing there, but I don't
03 believe I signed that lease.

04 Q And the condo, did Mike pay the rent of the
05 lease?

06 A Yes.

07 Q What about all the utilities? Mike paid the
08 utilities?

09 A Yes.

10 Q What about for groceries?

11 A These were all business expenses.

12 Q In other words, yes, they were paid by Mike?

13 A Yes, they were paid by the business.

14 Q For the house, same setup where Mike would
15 pay the rent, the utilities and the groceries?

16 A Yes, they were all business expenses. We
17 would have customers come and dinghy up to our dock and
18 then we would entertain them, make dinner. We had them
19 over there for Christmas and all kinds of occasions.

20 At that point, they even took my car. A lot of
21 our customers didn't have residences. They would come
22 to the shop in their boats. We would deliver product
23 to them in my dinghy.

24 We even helped a customer transport his boat from
25 Fort Myers across Lake Okeechobee over a Thanksgiving

01 weekend during COVID. That's where I broke my arm and
02 still went into -- broke my leg and still went into
03 work to pack boxes.

04 Q When you were moving the boat, you were just
05 doing that as a favor?

06 A A customer asked for help and we did that.
07 I'm not going to say I didn't enjoy the trip, but Mike
08 told me that we had to do that. So, I considered it a
09 business trip.

10 Q How long did that trip last?

11 A I think it was three nights and four days.

12 Q Did the customer accompany you on the boat?

13 A Yes. He needed more people on the boat to
14 get through all the locks. And at the same time, we
15 were still making -- we were still on our phones taking
16 care of business, but it was slow.

17 Q And so, you're saying is during the three
18 nights, four days, a customer took his -- took you on
19 his boat from Lake Okeechobee --

20 A Across Lake Okeechobee.

21 Q -- across Lake Okeechobee. You considered
22 the whole time that you were on there as a business
23 trip that there was no part that was vacation, the
24 whole three nights, four days, it was all work?

25 A That's not what I said.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 73

01 Q Okay.

02 A I said I considered a business trip, but I
03 did enjoy it.

04 Q Okay. You said you were on your phones the
05 whole time?

06 A I did not say the whole time. I said
07 business was slow, but we were on our phones.

08 Q Okay. And so, were you taking the boat
09 across Lake Okeechobee or from Lake Okeechobee to South
10 Florida?

11 A Across Lake Okeechobee.

12 Q Isn't Lake Okeechobee an open lake?

13 A No, they're locks.

14 Q In the middle of the lake, there are locks?

15 A Yeah. The customer couldn't cross alone and
16 it ended up that two other individuals were on that
17 boat with us, but I don't believe that's how it
18 initially was set up. And we enjoyed a Thanksgiving
19 meal together.

20 Q How big was the boat?

21 A It was a Power Cat, I'm not sure about the
22 exact length.

23 Q Over 50?

24 A Right around there, it was an Africat.

25 Q You said you enjoyed a Thanksgiving meal

01 together. So, this would've been in November of 2022 --
02 excuse me, 2020?

03 A Yes.

04 Q And you said it was slow during that time?

05 A Yes.

06 Q When you say we were taking calls, was it you
07 taking the calls or was it Mike answering the phone and
08 taking the calls?

09 A Mike prim -- Mike would answer all the phone
10 calls. I would make phone calls if something else
11 needed to be done, but all of the incoming calls always
12 went to Mike's phone.

13 Q So, if we looked at your phone records, it
14 would show your outbound calls from your 0840 number?

15 A Yes. But there was a lot of stuff that's
16 been done over WhatsApp also.

17 Q And the WhatsApp, through your phone number
18 on WhatsApp or through Mike's?

19 A Mike's. I bet today, still to this day his
20 WhatsApp is also on the computers at work.

21 Q Okay. And then we talked about at the slip,
22 we talked about the two residences between Mila and the
23 Briny Apartment, the condo and the house. And then we
24 get to the Briny Apartment.

25 A Yes.

01 Q And there as well, Mike paid the rent, the
02 utilities and the groceries?

03 A Yes, I was on that lease.

04 Q For the -- that condo that you moved to after
05 you were living on the boat, did that condo come with a
06 slip or did you have to rent -- did one have to be
07 rented separately?

08 A There were two slips.

09 Q Okay. And those slips were used for Mike's
10 boat and your boat?

11 A Yes.

12 Q And did Mike pay the rental for both slips?

13 A At that time, yes.

14 Q For the house, did it come with dockage?

15 A Yes.

16 Q So, you didn't have to pay anything separate
17 for that?

18 A No.

19 Q But then at Briny again, you had to pay for a
20 slip?

21 A Yes.

22 Q And did Mike pay for the slip for your boat?

23 A No.

24 Q Did you pay the slip for your boat?

25 A Yes.

01 Q Did you pay directly to the owner of the
02 slip?

03 A Yes.

04 Q Did you continue to keep your boat behind the
05 Briny Apartment after --

06 A Briny was on the ocean.

07 Q I'm sorry?

08 A Briny was on the ocean.

09 Q Okay. So, there was a separate slip?

10 A Yes.

11 Q Did you continue to keep your boat at the
12 slip after you and Mike were no longer together in
13 2022?

14 A Yes.

15 Q Before you and Mike were no longer together,
16 so during the time that you were both residing at the
17 Briny Apartment, was Mike paying for the slip for your
18 boat or were you paying it?

19 A No, I was.

20 Q Okay. And during the time that you and Mike
21 were together at the Briny Apartment where you were
22 paying for your boat, so that was only for about a
23 couple months, right?

24 A No.

25 Q For how long were you and Mike living

01 together at the Briny Apartment?

02 A I picked up paying that slip in January of
03 that year. That lease was only in my name.

04 Q Okay. The Briny Apartment, you were the only
05 one on that lease?

06 A No, on the slip lease.

07 Q Okay. So, for the slip lease -- let me back
08 up, for the Briny Apartment, you and Mike were only
09 there residing together for a couple of months, is that
10 right?

11 A I was only there for about three months, I
12 believe, two or three months, excuse me. I request to
13 be taken off the lease, but they wouldn't do that.

14 Q Okay. And so, during the two or three months
15 that you were living with -- let me back up. Did you
16 have -- did you start that slip lease before you move --

17 A Yes.

18 Q -- and Mike moved over to the Briny
19 Apartment?

20 A Yes.

21 Q Okay. Do you remember how much the lease was
22 at the Briny Apartment a month?

23 A \$5,000.

24 Q What about at the house that you lived at
25 beforehand? How much was the monthly lease there?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 78

01 A \$4,300 or \$4,400.

02 Q And then what about the condo before that?

03 A \$3,300 with the dockage.

04 Q 33 --

05 A \$3,300 with the dockage.

06 Q \$3,300 with the dockage. And when you were
07 both living on the boat, how much was the slip rental a
08 month?

09 A Started out around \$850 went up to \$880.

10 THE COURT REPORTER: I am sorry. Off the
11 record.

12 (Thereupon, a short discussion was held off
13 record.)

14 (Deposition resumed.)

15 BY MR. POLLOCK:

16 Q All right. So, we talked about the different
17 apartments, talked about the leases and then besides
18 the payments that we talked about for rents, utilities,
19 groceries, leases, car insurance, making it -- paying
20 off your car, did Mike also pay for vacations for the
21 two of you to take?

22 A We went on business trips.

23 Q Okay. So, on business trips, since 2019,
24 what business trips have you gone on with Mike?

25 A What month of 2019?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 79

01 Q Since June of 2019.

02 A We went to Greece on the boat. We had two
03 customers with us.

04 Q Okay. For how long was that trip?

05 A I believe two -- a little over two weeks.

06 Q And that was for two weeks on a sailboat
07 cruising around Greece?

08 A Yes.

09 Q Okay. And during that -- and when was that?
10 Was that in 2019, 2020?

11 A That was summer of 2019.

12 Q And so, for those two weeks in 2019, what
13 work were you doing?

14 A Anything that Mike -- if -- he was still
15 taking calls on his cell phone.

16 Q Okay. That's Mike working. I'm asking about
17 you, what kind of work were you doing while sailing on
18 a sailboat around Greece?

19 A If Mike asked me to take a note, then I would
20 take a note. But when I was sailing on the boat, it
21 was primarily entertaining customers.

22 Q Okay. And what were you doing to entertain
23 customers?

24 A We were together. We were sailing, we were
25 going out to eat and trying to get along.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 80

01 Q Trying to get what?

02 A Trying to get along.

03 Q Trying to get a loan?

04 A Along.

05 Q And so, while you're on a boat sailing --

06 A I was -- I mean if you want to be technical,
07 I was pulling sails. I was helping dock. I was
08 helping with the dinghy. I was swimming out to put out
09 an anchor or swimming to secure a line.

10 Q Okay.

11 A I was enter -- I -- you know, it was
12 entertaining. We had an obnoxious French Canadian with
13 us who was consistently causing -- we were arguing.

14 Q Were these customers that you -- or you and
15 Mike were friends with before going on that trip?

16 A Yes, I have several friends that are
17 customers.

18 Q And these --

19 A And customers that became friends.

20 Q And the two customers that you were on the
21 boat with in Greece in the sailboat, are you still
22 friendly with them now?

23 A Yes.

24 Q And so, what made it a work trip?

25 A Just the nature of being with the customers.

01 Q Okay.

02 A Because trust me, like I said, the French
03 Canadian was obnoxious.

04 Q Did Mike pay for that whole trip for the two
05 of you?

06 A Yes, he did.

07 Q And the boat?

08 A Yes, he did. I believe the boat was actually
09 expensed out. I think between -- there actually was a
10 couple -- there were two couples and a single
11 individual.

12 So, I'm not exactly sure how that all worked out.
13 But I know to rent the boat that we had to provide that
14 we had us -- our captain had the documentation to
15 navigate the yacht.

16 Q And who was -- was it Mike that was the one
17 who had the documentation to navigate the yacht?

18 A I also had some.

19 Q Which documentation did you have at that
20 time?

21 A That was just a really easy coast guard
22 school.

23 Q The one that --

24 A A boater's license, yeah. Sorry.

25 Q The boater's license that you take online for

01 kids now when you turn whatever it is, 13 or something?

02 A Um-hum.

03 Q That's a yes?

04 A Yes.

05 Q And did Mike have further certifications or
06 documentation in that boater's license at the time?

07 A He did have his captain's license under his
08 Greek name, but Mike didn't want to produce his Greek
09 passport.

10 Q In addition to paying -- so, in addition to
11 paying for the boat and the provisions, Mike also paid
12 for the airfare and all the restaurants?

13 A Yes.

14 Q And when you flew there, did you sit in
15 economy? Did you sit in first class? Did you sit in
16 business?

17 A Economy.

18 Q So, that was one trip that you mentioned was
19 the two-week trip on the sailboat around Greece, what
20 other trips did you take with Mike since June of 2019?

21 A We went to my granddaughter's third birthday.

22 Q When was that?

23 A June of 2020.

24 Q I'm sorry?

25 A June of 2020.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 83

01 Q And where was that?

02 A Kansas.

03 Q How long was that trip?

04 A Two nights.

05 Q Mike paid for that whole trip as well?

06 A Yes, I believe so.

07 Q Any other trips with Mike since June of 2019?

08 A No -- wait, there was one overnight stay in
09 The Bahamas. Excuse me, we had some defective pumps
10 and we had -- we rent them out, excuse me and stayed
11 overnight to customers over there.

12 Q Which island?

13 A Exumas.

14 Q And that was when?

15 A Right before COVID shut down, the week of.

16 Q So, it would've been in March?

17 A Yeah, because we came back and then we were
18 supposed to fly down to Puerto Rico for a show. And
19 the day that the airline shut down was the day that we
20 were supposed to fly out and we had just got back from
21 The Bahamas.

22 Q Okay. Besides paying for these trips, did
23 Mike also put money into your bank account?

24 A No.

25 Q How about SeaWater Pro, did SeaWater Pro put

01 money into your bank account?

02 A No, I was never paid for my wages.

03 Q Did you either -- did you ever get a check
04 from Mike or from SeaWater Pro since 2019 -- since June
05 of 2019?

06 A Mike presented me with a \$600 check.

07 Q Okay. When was that?

08 A That was in 2021.

09 Q Why did -- why do you understand he did that?

10 A Because I had never been paid. I had told
11 him several -- we had addressed the issue of me never
12 being paid and I was angry at how much he was paying
13 all the employees and how everyone had their handout.
14 And I had never received any money for anything for any
15 hour that I worked.

16 Q Did Mike ever give you cash?

17 A He gave me cash that I kept in a separate
18 wallet.

19 Q What about the \$3,000 a month Mike was giving
20 you in cash?

21 A The \$3,000 that he told my son that it was
22 for relocation.

23 Q Okay. So, there's \$3,000 that Mike mentioned
24 to your son?

25 A He wanted me to relocate.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 85

01 Q Okay. And then didn't you also receive
02 \$3,000 a month in cash from Mike?

03 A After this, it was not for wages.

04 Q Okay.

05 A And this was after I left the business. If
06 you read the text with my son, he wanted me to leave
07 the state.

08 Q Okay. So, after --

09 A That was not wages.

10 Q After June of 2022, you're saying is when you
11 started receiving \$3,000 a month?

12 A No, I didn't receive any -- yes, after
13 June of 2022. I'm sorry, I thought you said 2020.

14 Q Okay. And for how long did that continue?

15 A He gave me two \$3,000 payments and then sent
16 \$3,000 to my son, like I stated.

17 Q Did you deposit any of the cash that Mike
18 gave you to your bank account?

19 A Yes, I did. I had also left -- he had
20 ownership of all my property and disposed of it too.

21 Q Well, I mean, we're not here about that
22 today, are we?

23 A No, we're not.

24 Q Okay. And in fact, Mike had the property
25 delivered to you, but you refused to accept it because

01 you had no place to store it, is that right?

02 A Not all of my property.

03 Q Did you go through and pick out what you
04 wanted and then tell him to take back the rest or how
05 did that work?

06 A He came and he disposed of it on my
07 landlord's. I had just re -- gotten a new landlord and
08 he just dumped it there. I drive a Prius C. I didn't
09 have anywhere to put that.

10 So, yes, he did come back for that property, but
11 he stated to me that he had disposed of a great deal of
12 my property. I bought half the furniture when we moved
13 into that condo and I haven't got a single piece of
14 furniture.

15 Q I'll show you what is marked as Defendant's
16 101.

17 (Thereupon, Defendant's Exhibit 101 was
18 entered into the record.)

19 MR. POLLOCK: I don't know if you want a copy
20 or not.

21 MR. CUTHBERTSON: I don't.

22 MR. POLLOCK: Okay.

23 BY MR. POLLOCK:

24 Q Do you recognize this document that's been
25 identified as Defendants 101, it bears Number PLA 1559

01 at the bottom?

02 A Yes.

03 Q Okay. And this is a page from a bank
04 statement from your Wells Fargo account ending in 2911
05 for the period of March 9th through April 8th, 2021, is
06 that right?

07 A Yes, I believe so.

08 Q Okay. And on here, there are two transfers
09 from Mr. Spanos' account to yours. Do you see those?

10 A Yes.

11 Q Okay. So, they total \$1,100?

12 A Yes.

13 Q Okay. So, we know at least that besides what
14 you've already told us, that Mr. Spanos transferred
15 another \$1,100 into your bank accounts on April 1st and
16 2nd?

17 A Yes. I see two checks that went in there.

18 Q Okay. Are those checks or those are
19 transfers?

20 A They're transfers.

21 Q Okay. And what do you contend those transfers
22 are for?

23 A I believe they were reimbursements for a
24 deposit that we made on a condo.

25 Q Okay. So, would you have a receipt to reflect

01 your payment of \$1,100 towards this condo?

02 A No, I don't.

03 Q Okay. Do you have a canceled check or
04 anything to reflect your payment of any money towards
05 this condo, which you contend this money was reimbursed
06 before?

07 A I might have a check. I would have to look.

08 Q And you said this would've been a
09 reimbursement?

10 A Yes.

11 Q Why would he have reimbursed you?

12 A For the deposit, we didn't have a business
13 check, so I wrote it on my personal check. And this
14 was a transfer from his personal account for both.

15 Q Right. So, why couldn't Mike have written a
16 personal check?

17 A Because we didn't have the personal check when
18 we signed the lease to hold the property.

19 Q So, Mike didn't have any checks from either
20 his personal or the business account?

21 A No, but I did.

22 Q And so, what Mike was doing was he was paying
23 you back for any money that you had contributed towards
24 that deposit, is that right?

25 A Yes, I believe that's what that was for.

01 Q Okay. So, besides these two transfers to your
02 personal checking account, are there any other
03 transfers or checks that you received from Mike
04 deposited into your personal checking account?

05 A I don't know. If there were, it would've been
06 a like situation.

07 Q Okay. A like situation, meaning Mike would've
08 been reimbursing you for an expense that you paid?

09 A Yes.

10 Q So, kind of a personal living expense, since
11 Mike was taking care of them, he was reimbursing you
12 for those expenses, right?

13 A Yes.

14 Q So, in addition to the Wells Fargo account,
15 you also had a Chase account?

16 A Yes.

17 Q And for the Chase account, you had a checking
18 and a savings?

19 A I had -- at Chase I had a checking and savings
20 and at Wells Fargo I had a checking and savings.

21 Q So, at what point did you tell Mike that you'd
22 had it and you didn't want to work for free anymore and
23 stop working for him?

24 A I never wanted to work for free.

25 Q Okay. So, at what point did you stop working

01 for Mike since you had claimed you hadn't gotten paid
02 anything?

03 A I stopped working for Mike at -- in the end of
04 June of 2023.

05 Q '23?

06 A '22, sorry. '22.

07 Q Okay. So, you're saying that for -- I don't
08 know what, four and a half years, you just decided to
09 work for nothing?

10 A No, Mike always stated that he was going to
11 pay me. Anytime I addressed it to him, he'd be too
12 tired or change the subject.

13 Q And didn't you consider yourself an owner of
14 the business?

15 A I was not on the LLC.

16 Q That's not what I asked. Did you consider
17 yourself an owner of the business?

18 A I was never paid for anything that I did, nor
19 did I receive any sort of -- well, Mike was buying
20 luxury cars and boats. I didn't have the opportunity
21 to buy anything of -- any value for myself.

22 Q Okay. And yet --

23 A So, no, I didn't consider myself an owner of
24 the business because I was getting nothing from the
25 business. I couldn't fill out a credit app for

01 anything.

02 Q So, you wouldn't have written any e-mails or
03 text messages to Mike telling him that, you know, you
04 feel like you should get a part of the business or you
05 feel like you're an owner of the business or a partner
06 in the business, nothing like that?

07 A No. I did approach him at one time to put me
08 on -- to give me part ownership of the business. He
09 said he would not do it.

10 Q When was that?

11 A That was when we were living off Tropic Isle
12 in the house.

13 Q In what year?

14 A That would've been 2022.

15 Q So, it'd been before you moved to the Briny
16 Apartment?

17 A Yes.

18 Q And at what point did you sign or Mike sign
19 paperwork to authorize you to have complete access to
20 the bank account used by SeaWater?

21 A From inception.

22 Q Did you use that bank account to make
23 payments to vendors?

24 A Yes.

25 Q And did you run payroll or somebody else did?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 92

01 A I ran payroll until the bookkeeper came, and
02 then I still signed checks.

03 Q When did the bookkeeper came?

04 A I'm not sure the exact month.

05 Q What about the year?

06 A She started when we were in the -- off Second
07 Ave. And that year would've been 2000, I believe she
08 started shortly after -- it was during the COVID
09 period.

10 Q In 2020?

11 A Um-hum.

12 Q That's a yes?

13 A Yes.

14 Q So, when you say that you, and you still
15 signed checks, that means that if we asked Wells Fargo
16 for copies of the checks, it would show your signature
17 on paychecks?

18 A Yes, it would.

19 Q And how often would you sign the paychecks?

20 A Weekly. In fact, we didn't go to W2s until
21 2020 January. Before that, they were just paid
22 straight. You would find checks in the -- those checks
23 also to employees.

24 Q How many employees were we talking about that
25 you'd have to sign checks for?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 93

01 A Well, we were paying to we paid Ernst that
02 way. We also paid Tibby and Kristen that way. We paid
03 Trevor. We paid a guy named Mike, who was only there
04 for a few weeks.

05 We paid the other Dillon, Jessie Glenn. My Dylan,
06 Bailey had her checks on that way. I don't believe we
07 missed. Wait. There was another guy that was there
08 for a very very short time, but I don't recall his
09 name.

10 **Q And so, your responsibility with respect to**
11 **those paychecks was just to sign him?**

12 A No, I had to calculate the hours. Initially
13 we went by word of mouth with those employees. Then at
14 some point Trevor started writing his 10 hours down on
15 a piece of paper because, I knew he was fudging.

16 And that's why the timekeeping system was
17 originally was then implemented. But I witnessed
18 Bailey circumvent it that I -- when in for -- at that
19 time period.

20 **Q And so, from January of 2020 onwards, you**
21 **weren't signing checks? You weren't calculating hours?**

22 A No, I was signing checks.

23 **Q You weren't calculating hours after that?**

24 A No, I was calculating hours.

25 **Q For everybody, every week?**

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 94

01 A Yes.

02 Q After you moved to W2?

03 A Yes.

04 Q Until when?

05 A Until I left. The bookkeeper started doing
06 the he -- she would input the hours into the system,
07 but I still signed the checks because I was busy
08 packing boxes and doing pre-assemblies.

09 Q And so, you were busy packing boxes and doing
10 pre-assemblies all the way through, including March,
11 April, May, June of 2022?

12 A It wasn't, I -- when I left in March of 2022.

13 Q So, beginning of the year, January, February,
14 March of 2022 you were packing boxes and doing pre-
15 assemblies?

16 A Yes, I was on the floor every day. Even when
17 Mike left for lunch. We're talking 2021. I'm sorry,
18 2021.

19 Q Okay. I was talking January, February, March
20 of 2022. You were packing boxes and doing pre-
21 assemblies?

22 A Yes.

23 Q And then you said 2021?

24 A Yes.

25 Q Okay. So, explain that to me. You were busy

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 95

01 packing boxes and doing pre-assemblies until when?

02 A Until March.

03 Q Until March of 2021?

04 A Yes.

05 Q Okay. Why March of 2021?

06 A That's when Dylan left and Bailey went to
07 work.

08 Q Okay. And when Dy -- when Bailey went to
09 work, you wouldn't work with her?

10 A No.

11 Q Okay. And so, let's see, up to March of
12 2021, how many times had you e-mailed or texted Mike or
13 sent him a WhatsApp about how upset you were that you
14 hadn't gotten paid anything for all the work you did?

15 A I didn't have to e-mail him, text him. He
16 came home and I told him.

17 Q Okay.

18 A He also kept saying that he was going to get
19 rid of Bailey and that I would be going back to work,
20 that didn't happen.

21 Q Okay. So, you didn't send him any kind of --
22 have any exchange by text or e-mail or WhatsApp about
23 getting paid, but you did have an exchange with him
24 about being an owner or a partner or some kind of --

25 A Yes, I told him to give me a percentage of

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 96

01 the business if he wasn't going to pay me, and he
02 didn't do that. In fact, he gave half the business to
03 my niece in his will.

04 Q Okay. And so, you told him to give you a
05 percentage of the business if you were not going to pay
06 her. When did that happen?

07 A That happened when we were on the house in
08 Tropic Isle.

09 Q In '22?

10 A Um-hum.

11 Q And by that point you were working about how
12 many hours a week?

13 A At what point? What year?

14 Q Well, at the time that you sent him an e-mail
15 saying --

16 A I did not send an e-mail.

17 Q Okay. Did you text him?

18 A I didn't have to text him. He was home every
19 night.

20 Q Okay. So, there's no text or e-mail or
21 anything about your getting a percentage of the
22 business?

23 A No.

24 Q You talked to Mike in?

25 A He refused.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 97

01 Q In 2022?

02 A And he refused. And it --

03 Q Hold on a second. This -- it doesn't work
04 like this. I just need to ask you the question and
05 then you can go ahead and answer.

06 So, in 2022 while you were at the house in Tropic
07 Isle, you told Mike to give you a percentage of the
08 business if he was not going to pay you. Is that
09 right?

10 A Yes.

11 Q Okay. At that time you were working how many
12 hours a week?

13 A I was working in the evenings with him.

14 Q And how many hours is that you were working?

15 A I would -- when he would come home, you'd
16 generally take a nap and then he would get back up and
17 from like 08:00 to 02:00 we would be talking, he would
18 be on the phone with Jay Baldotta in India.

19 Sometimes the dealer would call -- dealers would
20 call and he would put them on speaker phone. We'd
21 speak, but I was constantly looking at social media.
22 Social media alone took forever.

23 We had the YouTubers doing their thing and also
24 any reviews or anything like that. He also had Bailey
25 living in our house at that time also.

01 Q Okay. But in figuring out how many hours a
02 week you were working, you said that Mike would take a
03 nap. He would be up from 08:00 a.m. to 02:00 p.m. He
04 would have --

05 A No 08:00 p.m. to 02:00 a.m.

06 Q Sure. I mistake 08:00 p.m. to 02:00 a.m. He
07 would be talking to dealers and people in India and
08 he'd have a lot?

09 A He on his phone like he is right now.

10 Q Okay. And so, that's Mike working, and you
11 said you were on social media. So, for how long were
12 you on social media?

13 A Generally that whole time. Because you had
14 Star Trek on the TV in the background.

15 Q So, you were on social media for six hours a
16 night. What were you doing for six hours a night on
17 social media that was work related?

18 A Looking for reviews, I would go to TikTok or I
19 would go down to the Google store and find out any new
20 social media site that was being started. And I would
21 reserve the SeaWater Pro names, so nobody else would
22 get that.

23 I was posting videos on sites. I was also -- I
24 still had -- I was doing the Instagram and the Facebook
25 thing too.

01 Q Right. But for Instagram and Facebook, you
02 can see when those posts were uploaded, right?

03 A Yes.

04 Q Okay. And so, if we look at the Instagram
05 and the Facebook account for SeaWater Pro, in 2022, we
06 could see when you were posting anything on behalf of
07 SeaWater Pro. Is that right?

08 A Posting, but you wouldn't see anything from
09 about the comments and stuff made on the Watermakers
10 discussion group.

11 Q Okay. Exactly, and so for that reason --

12 A Right. You would not see those.

13 Q Right. But we will get them in response to
14 our request for the history of what you've done.

15 A Not necessarily because some of those posts
16 were made under my personal page.

17 Q Right. And since we've requested from your
18 personal or any account that you have access to all
19 posts that you've made on behalf of SeaWater Pro, we
20 should be getting those. Do you understand that?

21 A That's SeaWater Pro, but under my own
22 personal name, it wouldn't be. Mike used to respond
23 off my account direct to the Watermakers discussion
24 group because the Watermakers discussion group wouldn't
25 take the SeaWater Pro or the -- with the business page

01 to be accepted into the group. But they took my
02 personal Facebook account to be accepted.

03 Q Right. So, all we have to do is look at your
04 history and your personal Facebook account and then
05 we'd see when you made those comments, right?

06 A No, I've got automatic delete on that stuff.

07 Q Automatic delete on what stuff.

08 A That -- my Facebook history.

09 Q Since when?

10 A This started what, two years ago or
11 something. They gave you the choice, I believe.

12 Q So, since after you stopped working at
13 SeaWater Pro, you're saying that you turned on
14 automatic delete?

15 A No, I never. I -- they gave me an option to
16 get rid of history and whenever that option came up, it
17 wasn't anything to be -- it was something they said, do
18 you want to delete it? And I said yes. I don't
19 remember the exact timeframe. Whenever they did their
20 privacy update features.

21 Q Do you know whether that was before or after
22 you stopped living with Mike in 2022?

23 A What?

24 Q That you enabled the option to delete the
25 history of your Facebook?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 101

01 A Oh, definitely when I was with Mike.

02 Q And then you created a Facebook account for
03 SeaWater Pro?

04 A Yes.

05 Q Is that Facebook account for SeaWater Pro's
06 yours, or is it SeaWater Pro's?

07 A The Judge order that it's Mike's, it was set
08 up on a personal Facebook page.

09 Q Okay. And so, have you provided Mike the
10 login information for that?

11 A I'm unable to do so, and I explained that to
12 the Judge.

13 Q And why are you unable to provide it?

14 A Because there isn't a separate login and
15 password.

16 Q And so, what hap -- what's happened with that
17 page? Is it still active?

18 A It's deactivated. Mike's -- his programmer
19 or his computer guy was supposed to call me and I
20 refused to return any calls or e-mails. I've forwarded
21 that information to my prior attorney.

22 Q While you maintain access to that Facebook
23 page and had it enabled, did you have it directed to X-
24 rated or porn sites?

25 A No, that's a different Facebook page that

01 Mike had set up prior to me doing that. I have nothing
02 to do with that page.

03 Q Okay. Did you post negative reviews on
04 Facebook about SeaWater Pro and/or Mike?

05 A Negative reviews?

06 Q Yes.

07 A No, reviews.

08 Q When I say negative reviews, we're talking
09 about negative commentary about SeaWater Pro --

10 A Comments are different.

11 Q -- or it's, or it's Pro.

12 A I made comments on that page stating what
13 had -- the treatment that Mike was doing to me. Yes, I
14 did.

15 Q Made comments on which page, the SeaWater Pro
16 page?

17 A Yes. But I also stated that this was a
18 personal page, not a business page at that time.

19 Q "At that time," meaning after March of '22?

20 A Yes.

21 Q On your personal Facebook page, did you share
22 information about Mike's medical history?

23 A Yes, I did.

24 Q Why?

25 A Mike's condition does not allow him to lift

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 103

01 heavy boxes to run that business. He can't lift over
02 50 pounds. The units alone, the motors 37 pounds and
03 the other boxes were between 50 and 75 pounds. He
04 wasn't physically able to run that business alone.

05 Q Okay. But at the time you shared Mike's
06 personal health information, he wasn't running the
07 business alone, he had other employees, did he not?

08 A Yes, he did.

09 Q Okay. And so, you indicated that Mike's
10 medical conditions restricted his ability to lift, not
11 the reason why you shared that on your personal
12 Facebook page. So, why was that?

13 A I shared the information because I had never
14 been compensated for anything that I had ever done
15 through the Facebook for the SeaWater Pro. And Mike
16 was not going to do anything. It was grotesque and
17 something I should not have done, and I'm paying my
18 price for that.

19 Q And when did you post this information,
20 Mike's medical information on your Facebook page?

21 A After June of 2023.

22 Q Would it have been sometime in 2023 after
23 June?

24 A Yes.

25 Q What else did you do or share online about

01 Mike or his business because of your claim that you
02 hadn't been compensated for what you did for SeaWater
03 Pro?

04 A I was never compensated and I stated that on
05 the page.

06 Q Okay. What else?

07 A I reiterated several times that I had never
08 been paid.

09 Q Okay. Other than on -- besides on your
10 Facebook page, did you share other information about
11 Mike or SeaWater Pro that was negative or painted them
12 in a bad light since March of 2022?

13 A That's vague.

14 Q Okay. Your objection has been noted. If you
15 can answer me, please.

16 A I did state that he had taken his -- the
17 relationship with my niece, how he had taken her Greece
18 alone and how he had given her a business car knowing
19 full well that she had a DUI.

20 Q Okay. What else?

21 A On that page is also where my niece's
22 girlfriend, I had learned through a neighbor that they
23 were saying that I was going to go to the warehouse and
24 shoot them.

25 And that's where the comment about guns came in.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 105

01 I said on this -- I made a comment that told her that
02 she said I was going to shoot them like they were in.
03 They're crazy.

04 Q Okay. What else did you post on social
05 media?

06 MR. CUTHBERTSON: Objection. Asked and
07 answered.

08 BY MR. POLLOCK:

09 Q Did you finish answering what other instances
10 or comments have you made the painted Mike or his
11 business in a bad light on social media other than what
12 you've already discussed? Videos, comments?

13 A I posted videos that I felt was inappropriate
14 for the business that my niece had tagged with the
15 SeaWater Pro name of TikTok.

16 Q Okay. What else?

17 A There were responses to some of the stuff on
18 my Facebook page that was somebody had created an
19 account with my son's name and they said they were my
20 daughter as Mindy Michaels and I do believe that was my
21 niece and her girlfriend, and I believe that might have
22 been under his directive.

23 Q Why do you believe that?

24 A Because Mike had fired my niece during that
25 time. And from the dates that her girlfriend went back

01 into work and the comments they made on that page.

02 Q And on the Facebook page that you said was
03 deactivated, does that mean that if you went on to
04 Facebook and searched for SeaWater Pro it wouldn't come
05 up?

06 A It's not.

07 Q Have you looked to see whether it still does?

08 A No, it does not. The other page that Mike
09 paid \$384 a month prior to me setting up that page
10 still shows up and it's still being diverted to a porn
11 site. I had nothing to do with that. And he knows it.

12 Q I mean, that's a SeaWater Pro page you
13 created, right?

14 A No, that is not because it's deactivated. If
15 you would -- can you scroll down a little bit? Hang
16 on, take it down a little bit. I need to look at the
17 phone number on that page. Okay. 602, that's the page
18 that he had the other company create because the number
19 went from a 602 number to the 954 number.

20 Q Okay. So, is this the SeaWater Pro page that
21 you created?

22 A No, that's his current official page.

23 Q So, the SeaWater Pro page, you're saying that
24 has 183 likes and 154 followers is something that Mike
25 had somebody create and that he should have access to?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 107

01 MR. CUTHBERTSON: Can you say it again, where
02 it shows the likes you just mentioned?

03 MR. POLLOCK: It just shows 138 likes and 154
04 followers under, under the name. Just to
05 distinguish it from the other one, I didn't know
06 any other way to do it other than reading off the
07 address, which was going to be a bunch of numbers.

08 MR. CUTHBERTSON: You can answer.

09 A Yes. He was paying 300 some dollars a month
10 to somebody else to do that and they weren't doing any
11 other out direct marketing campaigns.

12 BY MR. POLLOCK:

13 Q When did he start doing that to pay somebody
14 else to run --

15 A Before I had set up the other page because I
16 didn't like the idea of the name on somebody else
17 controlling the name and having the rights to that
18 name.

19 That's why I took the SeaWater Pro Watermaker
20 page, her name and why I reserve that name with a bunch
21 of different social media numbers.

22 Q Did you ever have access to this page that
23 we're talking about, the 138 likes and 154 followers?

24 A No. I -- Mike was supposed to find out who
25 had access and who started that page by this -- when we

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 108

01 went to Court for the second contempt charge. When my
02 attorney asked if they had clarified the ownership of
03 that page, his attorney informed my attorney that they
04 had not done so.

05 Q When you were in Greece during the summer of
06 2019, is it your contention that you were working 91
07 hours that week?

08 A I was available those 91 hours.

09 Q Okay.

10 A Mike wasn't giving me a directive of what to
11 do, like we had when we were at the shop.

12 Q So, while you were there if Mike asked you to
13 do something, you would, right?

14 A Yes.

15 Q But other than that you can enjoy the trip?

16 A Yes.

17 Q Would you say that same description would
18 hold true while you were on the boat from Okeechobee
19 down?

20 A Yes.

21 Q And was there a time while that you were
22 admitted to any hospital or other facility during the
23 five years before you filed the lawsuit?

24 A Yes.

25 Q How long were you admitted to Holy Cross

01 Hospital?

02 A Three nights.

03 Q During those three nights, and I'm not here
04 to embarrass you and I don't -- hope it doesn't come
05 off like that, but there's a claim that while you were
06 admitted to Holy Cross Hospital for those three nights,
07 that you were still working 91 hours a week. Is that
08 correct?

09 A No.

10 Q Okay. And you agreed that while you were in
11 the hospital those three nights at Holy Cross for the
12 psychiatric admission, that you couldn't have contact
13 with anybody outside of the facility?

14 A I had contact with Mike.

15 Q I'm sorry?

16 A I had contact with Mike.

17 Q Okay. And you had contact with Mike
18 consistently throughout, or only at the end in order to
19 get released?

20 A Consistently.

21 Q Other than talking with Mike is it true that
22 you couldn't use a phone, internet, e-mail, or have
23 visitors?

24 A I had no internet or e-mail, but I did have a
25 phone to talk to Mike.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 110

01 Q Is that the only person you're allowed to
02 talk to?

03 A No.

04 Q So, you talked with other people besides
05 Mike?

06 A Yes.

07 Q As far as visitors, you didn't have any
08 visitors?

09 A It was COVID.

10 Q What were you admitted for?

11 A I was -- Mike had called my son and convinced
12 my son to have me Baker Acted.

13 Q Okay. And so, Baker Acts or involuntary
14 commitments can happen different ways. Was this a
15 situation in which somebody, a law enforcement or other
16 agency took you to?

17 A No.

18 Q Okay. Was this a situation where you went
19 where Mike took you?

20 A Mike took me.

21 Q Did Mike take you kicking and screaming or
22 did you agree to go?

23 A I did not want to go.

24 Q I mean, but it's not like Mike physically
25 restrained you and prevented you from going, is it?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 111

01 MR. CUTHBERTSON: Objection, form.

02 A No.

03 BY MR. POLLOCK:

04 Q And so, during the time that you were at the
05 facility at Holy Cross, do you agree that you weren't
06 working?

07 A No, I was not working.

08 Q And had you received this kind of inpatient
09 treatment or evaluation in the past?

10 A No.

11 Q And you understand that as far as your claim
12 in this lawsuit, you're not claiming any money for
13 overtime that you worked during the three years before
14 filing the lawsuit in June of 2024, right?

15 A Ask that one more time.

16 Q Sure. You understand that in your lawsuit
17 there's no claim for overtime wages worked during the
18 three years before you filed the lawsuit?

19 A I was -- okay. I'm not sure if I'm
20 understanding this right.

21 Q Okay.

22 MR. CUTHBERTSON: Break it down for her.

23 BY MR. POLLOCK:

24 Q Go ahead. Mr. Cuthbertson can't help you,
25 but I'll try to ask it. You understand that your

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 112

01 lawsuit is not about overtime wages. Do you understand
02 that? You look a little puzzled.

03 A Yes, but for what years?

04 Q Well, you understand that you filed this
05 lawsuit against Mike and his company, right? It's a
06 yes?

07 A Yes.

08 Q And you understand that you filed it on
09 June of 2024?

10 A Yes.

11 Q Okay.

12 A I believe it was September though.

13 Q June 10th, 2024.

14 A Okay.

15 Q Excuse me. June 7th is when the Lawsuit was
16 filed of 2024. And you understand that under the law,
17 the most that you can claim is to try to go back three
18 years before then for overtime wages, so that all you
19 could do is claim with respect to overtime, is to try
20 to recover money for overtime that you would've worked
21 from June, whatever, 8th of 2021 through
22 June 7th, 2024.

23 MR. CUTHBERTSON: He's talking about the
24 statute of limitations.

25 A Okay.



Office Phone: 954-712-2600

Email: info@ucrinc.com

Website: ucrinc.com

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 113

01 BY MR. POLLOCK:

02 Q But how long the law allows you to go back?

03 A Yes.

04 Q And it's three years before you filed the
05 lawsuit?

06 A Yes.

07 Q And you understand that in your lawsuit,
08 you're not claiming you worked overtime during those
09 three years before you filed the lawsuit. Do you
10 understand that?

11 A I'm sorry. I don't.

12 Q Okay. What do you understand you're claiming
13 in your lawsuit?

14 A In my lawsuit, I told them the situation
15 and --

16 Q And I want to preface that because I want to
17 stop you there because you're saying what you told your
18 lawyers. I don't want to know what you told them
19 because that's privileged what you tell them, what they
20 tell you --

21 A Okay.

22 Q -- which that's off base and I don't want to
23 hear about that. But I do want to find out is what
24 you're, what you are claiming in your Lawsuit. Like
25 that's what I want to find out. What are your

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 114

01 allegations? What are you claiming as far as money?

02 A I told them when I worked, they applied the
03 law to what I -- to the hours I worked. How that's --
04 how the statutes work and how far you can go back. I
05 struggle with understanding this. I under -- I
06 struggle with understanding the Courts.

07 Q Okay.

08 A And they've met with me several times to try
09 to explain this to me.

10 Q Okay. And so, you had told us that you
11 stopped working in SeaWater Pro in March of 2022,
12 right? Is that correct?

13 A Not in March.

14 Q Okay. When did you stop?

15 A In March is when I went to working evenings
16 with Mike.

17 Q Again, that's when you said you were working
18 from --

19 A 08:00 to 02:00 in the morning?

20 Q 08:00 p.m. to 02:00 a.m. And was that seven
21 days a week? Was it five days a week? I didn't
22 under -- I didn't get that.

23 A It was every night. Realized that Bailey was
24 coming back or Bailey lived there part-time there and
25 she was informing of what had gone on in the shop

01 during that day.

02 Q Okay. But how many nights a week are you
03 claiming that you worked from 08:00 p.m. to 02:00 a.m.?

04 A I was at Mike's disposal that entire time to
05 do any directive that he gave me.

06 Q All right. So, kind of like when you were on
07 the sailboat in Greece, you could kind of do what you
08 wanted, but if Mike asked you to do something, you
09 would do it?

10 A Mike had control of every -- he had control
11 of what I did at all those times. I was to be
12 available.

13 Q Okay. What do you mean, you were to be
14 available? How did he have -- how did he have control
15 over what you did?

16 A He was there. I didn't just pick up and go
17 out for an evening by myself or have a girl's night
18 out. I was there for him.

19 Q Okay. Is that because Mike -- because you
20 asked Mike to go out for a girl's night and he said,
21 absolutely no way. Or did you just figure you would
22 spend the time with Mike?

23 A I would spend that time with Mike.

24 Q Okay. And as far as the time when Mike would
25 get up from his nap, and when Bailey would come home

01 and kind of give a download from the day, how is that
02 different than sitting around the dinner table and talk
03 to you about your day at work?

04 A Mike would not allow me to return to work at
05 LA Fitness. He was terrified of getting COVID. And --

06 Q But we're talking about in 2022, when you're
07 talking about?

08 A He still did not want me working outside of
09 the house because of COVID.

10 Q Okay. And LA Fitness was something that you
11 would do in the mornings when you --

12 A And in the evenings.

13 Q Okay. And now we're talking about this time
14 from March of '22 onward. When you were -- you said
15 you were working from 08:00 p.m. to 02:00 a.m., and you
16 said that Mike had control over what you did.

17 And you said that it's not like you went out with
18 girlfriends and had girl's nights. So, I'm trying to
19 find out how Mike controlled, what you were doing or
20 could do, any given evening during any of the nights of
21 the week, from March of 2022 on?

22 A Mike would not allow me to go work outside of
23 a controlled environment because of his fear of COVID.
24 So, when he was there and like during this meeting,
25 he's always on his phone.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 117

01 Q Okay. But that's Mike working and I'm asking
02 you. How did he have control over?

03 A He would come across something that he saw
04 that he wanted me to do. I was there to do it and I
05 did it.

06 Q Okay. So --

07 A It wasn't a formal environment like an
08 office. But in the cyber world, I was there, I was
09 checking, you know, I could go and check shipments if
10 he asked because I could log into the UPS module.

11 I, you know, I could check, and see what orders
12 came in. I could also get into the accounting system
13 and see what was going on there.

14 Q And I understand what you could do. What you
15 said was that Mike controlled what you were able to do
16 in the evenings. And I'm just trying to find out,
17 other than Mike telling you that you weren't allowed to
18 teach at LA Fitness in the evenings, which I think you
19 told us that that class would've been before 08:00 p.m.?

20 A No, there are 8 o'clock Pilates classes. You
21 can go to the LA fitness schedule right now and see, I
22 just take -- was taken off my 8 o'clock this past week
23 at night.

24 Q Well, you had said that, up to March of 2020,
25 the class that you would teach on Thursday nights

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 118

01 before 04:30 p.m.?

02 A No, on Thursday. That was at 09:45.

03 Q You said that you would teach Tuesday and
04 Thursday at 09:45?

05 A 09:45 Tuesday and Thursday morning, and 04:30
06 on Tuesdays, which I eventually gave up.

07 Q Okay. So, before March of 2020 with Mike,
08 you hadn't taught on at 08:00 p.m. on any of the
09 nights?

10 A That's true.

11 Q And so --

12 A I did teach in 2019. You're right. I did.
13 I gave up my evening classes in 2018.

14 Q And so, how did Mike control, what you could
15 or couldn't do while you were at home with him in the
16 evenings, from March of 2022 on?

17 A Mike stated that he at still in 2022, Mike
18 was still very afraid of getting COVID.

19 Q Okay. And so -- go ahead.

20 A Yes. And, he did not want me going to work
21 in a gym environment because he was afraid that I would
22 bring it home.

23 Q But other than not working at a gym, you
24 could pretty much do whatever you wanted.

25 MR. CUTHBERTSON: Objection. Calls for

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 119

01 conclusion.

02 BY MR. POLLOCK:

03 Q Go ahead.

04 A I didn't feel like I had that option.

05 Q Why not?

06 A He was also stating that he was going to fire
07 Bailey and bring me back the day-to-day operations.

08 Q When position wasn't standing over your
09 shoulder and telling you, you know, what websites you
10 could or couldn't look at, or what social media you
11 could or couldn't use, or what you could or couldn't do
12 on those, right?

13 A No, he was not stipulating where I had to be.

14 Q Wasn't stipulating where you had to be or
15 while you were home, what you had to do other than when
16 he would ask you to handle something that popped up
17 while he was on a phone call?

18 A If something popped up on a phone call. But
19 I was also looking for reviews and maintaining
20 correspondence through the Messenger app on Facebook.
21 And also, you know, looking at the Google Play stores
22 and trying to reserve the SeaWater Pro name like
23 Reddit, Pinterest, whatever, so that nobody else could
24 have access to that name.

25 Q I mean, as far as Mike having a fear of

01 COVID, you'd agree with me that Mike traveled during
02 COVID, and afterwards?

03 A No, Mike traveled some during COVID, not
04 during the height of COVID.

05 Q Okay. And then afterwards, Mike has
06 traveled, right?

07 A He took some trips. He eventually in 2022,
08 he did go to Puerto Rico with my niece. And he also
09 ended up going to an Annapolis with my niece also. But
10 it was very -- it was after -- it was after he was --
11 he had the vaccines which was after that time.

12 Q Okay. And since -- let's say, the summer of
13 2020, Mike went to restaurants with you, didn't he?

14 A If we ate outside?

15 Q And so you're saying from the summer of 2020
16 until for the next two years, you only ate with Mike
17 outside of restaurants?

18 A Pretty much, yes.

19 Q "Pretty much, yes," or we eat inside as well?

20 A Very, very rarely. He got his -- he was
21 vaccinated in February of 2019.

22 Q He was vaccinated in February of 2019 before
23 COVID?

24 A No, 2020. I'm sorry, 2020.

25 Q COVID started, from my understanding of when

01 we shut down was mid-March of 2020.

02 A Okay. I'm sorry, it was 2021. I'm getting
03 lost in years. Please forgive me. But I remember it
04 was February and DeSantis had opened up a special
05 vaccination period. Because I was at -- he wanted to
06 get that vaccine and I was at work, making calls for
07 him to get that vaccine.

08 Once he had the vaccine, he eased up a little bit,
09 but we still weren't eating inside at restaurants. We
10 were eating outside, which in Florida is not a big deal
11 because the weather cooperates.

12 Q And when you say, you were at work making
13 calls for him to get the vaccine, you're saying you
14 were sitting at work, but you were making calls to try
15 to get Mike on the list to get a COVID vaccine?

16 A Yes.

17 Q Okay. And everybody was trying to do it
18 round about that time, so it was taking a while?

19 A No. Not everybody could get that. Mike
20 could get it because of the CHF.

21 Q Okay. But you were spending a good portion
22 of your day trying to figure out how and where to get
23 Mike an appointment to get a vaccine?

24 A That was one of his directives to do.

25 Q Okay.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 122

01 A Just like Mike had me do his medications.
02 And when Mike stayed at the hospital, he requested that
03 I spend the night with him. And we went to his
04 doctor's appointments, still making calls in the car on
05 the way there, on the way back.

06 Q And you're saying, when you were doing Mike's
07 medications, you were doing that as his employee and
08 not his significant other?

09 A That's a hard one to say. I did not like
10 doing his medications. And you know, he takes 17 pills
11 a day. Just trying to get part of doing his medication
12 is getting the refills in the time it's allotted.

13 And during COVID, it was a matter of having Costco
14 deliver his medications.

15 Q And you were responsible for coordinating the
16 refills and also putting them into the pill cases --
17 the daily pill cases?

18 A And setting daily reminders on my phone for
19 times to take the pills. Yes.

20 Q And sometimes I'm here to ask a difficult
21 question. So, were you doing that as his girlfriend or
22 were you doing that you know, because you claim you're
23 his employee?

24 MR. CUTHBERTSON: Objection. Calls for legal
25 conclusion.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 123

01 BY MR. POLLOCK:

02 Q Go ahead.

03 A I did not like doing his medications and he
04 knew that. The pills are getting confusing and I
05 didn't want to mess them up.

06 Q Okay. And although you didn't like doing it,
07 I'm asking you, did you think you were doing it as his
08 girlfriend or were you doing it as his employee?

09 MR. CUTHBERTSON: Again, objection form. Go
10 ahead.

11 A Filling the pill boxes might have been as a
12 girlfriend doing, refilling the medications was a part
13 of the job.

14 BY MR. POLLOCK:

15 Q When you're saying you were getting the
16 refills, does that mean you would physically have to go
17 and pick them up including controlled substances, or
18 you would just call in and make sure that the refills
19 were sent over to the pharmacy?

20 A Because I filled the boxes, I knew which
21 pills he was out of. So, I would call the pharmacy and
22 then, Costco would deliver if you had so much money in
23 prescriptions and stuff like that.

24 Q Okay. So, you said the pill boxes were his
25 girlfriend. What -- and you said, but when you would

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 124

01 call Costco to get refills for his prescriptions, that
02 would be you were considering that work?

03 A Yes, because it was happening during work
04 hours.

05 Q Okay. And so, is that what's considered
06 work? Is something that happens during work hours?

07 MR. CUTHBERTSON: Objection, calls for legal
08 conclusion.

09 A No.

10 BY MR. POLLOCK:

11 Q Okay. And what are work hours?

12 MR. CUTHBERTSON: Objection, calls for legal
13 conclusion.

14 BY MR. POLLOCK:

15 Q You can answer. Unless he tells you not to.

16 MR. CUTHBERTSON: Go ahead.

17 BY MR. POLLOCK:

18 Q What are work hours?

19 A When I was -- to me, work hours was any time
20 that Mike had control over my time, which could be at
21 the shop. I considered -- I was frustrated when I was
22 supposed to manage the employees and then have to run
23 and get his prescriptions for him. Because I couldn't
24 effectively do both.

25 Q So, you saying you couldn't manage the

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 125

01 employees when you had to run basically a personal
02 errand for Mike?

03 MR. CUTHBERTSON: Objection, form. Answer.

04 BY MR. POLLOCK:

05 Q You can answer.

06 A I didn't -- I did not like doing that.

07 Because I knew the employees would do nothing when I
08 left.

09 Q Okay. And so, was it work -- did you
10 consider it work for SeaWater Pro and, Mr. Spanos when
11 you would leave the warehouse and have to go pick up a
12 prescription or run an errand for him personally?

13 MR. CUTHBERTSON: Objection, form. Go ahead.

14 BY MR. POLLOCK:

15 Q You can answer.

16 A No, that was part of my job.

17 Q Okay. And you said he had control over your
18 time. How did Mike have control over your time?

19 A Mike had control of my time. We were always
20 together. I mean, he gave my car away, so I didn't
21 even have the ability to run a simple errand by myself.

22 Q Couldn't use his car. Can you drive his?

23 A Yes, I could drive his car.

24 Q So, if you could drive Mike's car and you
25 went to work with him, how was he in control of your

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 126

01 time?

02 A We were -- Mike was selling so much stuff and
03 for me to get the product out were to handle the
04 employees. I needed to be available at the shop while
05 the employees were there to manage effectively.

06 If I missed a shipment because I was running out
07 to get his medications, he would become extremely upset
08 at me.

09 Q Was there somebody in the shop besides you
10 who was tasked with getting shipments out on time?

11 A Before Dylan, no.

12 Q Okay. And then once Dylan started?

13 A I told you in October or November of 2021.

14 Q So, in -- let's go through June of 2019
15 through the end of the year, what was your typical work
16 schedule a day or a week?

17 A It was 09:00 to 06:00 or 07:00 at night.
18 Usually, some nights we would go later.

19 Q And that was every day, including weekends?

20 A Definitely. Monday through Friday we were in
21 the shop. Usually another -- at least one of the
22 weekend days. And then there might be one day that we
23 did not go in.

24 Q And then the weekend that you would go in,
25 that would be what at full 09:00 a.m. to 06:00 or 07:00

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 127

01 p.m. or that would be a half day?

02 A We would go in usually on the weekend to the
03 warehouse. If -- we would be there around 09:00 and we
04 would stay generally until at least 04:00.

05 Q Okay. And did that same schedule continue up
06 through when COVID started?

07 A When COVID started the schedule --

08 Q Before COVID up?

09 A Before COVID.

10 Q January, February, and that first half of
11 March?

12 A Yes. Because we were doing \$100,000 months.
13 We grew -- the business grew unbelievably fast and we
14 didn't have it automated.

15 Q Okay. What about once you get into 2021,
16 what does that schedule look like?

17 A 2021 was about 09:00 to 06:00 or 07:00 in the
18 shop. Sometimes later.

19 Q Okay. That's Monday through Friday, same
20 thing. And then one day on the weekend in and one day
21 off?

22 A I'd say Monday through -- definitely Monday
23 through Friday, usually Saturday. Or we at least had
24 to go in, because a customer would come and pick up an
25 order.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 128

01 Q And then what changed in the end of February
02 of 2021? What changed in your schedule?

03 A That's when Dylan quit and Bailey went into
04 the day-to-day operations.

05 Q And so, what was your -- and that's when you
06 started working nights only or?

07 A Yes. But like I said, Mike kept saying that
08 he was going to fire Bailey.

09 Q When you're in the shop in the warehouse,
10 2020, 2021, do you have idle time?

11 A At that time, no. Really didn't have much
12 idle time.

13 Q So, if we take a look at your phone
14 records -- your personal phone records for both of them,
15 we'll see that there's not much activity because, you
16 didn't have much idle time from 09:00 a.m. to 06:00 to
17 07:00 p.m. Monday through Friday?

18 A I was on the computer. I was on the computer
19 and I was packing boxes.

20 Q Okay.

21 A When Dylan was packing boxes, I was checking
22 to see what they were packing. I was doing inventory
23 in the back of the shop. Just trying to get the
24 employees to do their job and to show up was a -- very
25 difficult.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 129

01 Q So, my question was, if we looked at your
02 phone records, the two phones that you had --

03 A No. That we also had an internal phone
04 system at that time.

05 Q Understand. But I'm talking about your
06 personal phones. You had two phones, two phone
07 numbers.

08 A No, only had one phone number. I didn't get
09 the second phone number until after I left Mike.

10 Q So, the phone number that you were using at
11 the time was 0840?

12 A Yes.

13 Q Okay. So, if we looked at the 0840 phone
14 number, then we wouldn't see much activity on that
15 number Monday through Friday, 09:00 a.m. to 06:00 or
16 07:00 p.m. During weekdays, because you didn't have
17 much idle time. Is that right?

18 A Sure. In fact, I usually did everything on
19 my watch because I couldn't carry my phone.

20 Q And when you say, you did everything on your
21 watch, as far as responding to text messages?

22 A I would see a text message coming on my watch
23 or a phone call coming on my watch.

24 Q And we're talking about -- looking at your
25 records, you understand that it's not just the phone

01 itself, it's what Verizon or whoever it was at the
02 time, would show the activity was as far as incoming
03 and outgoing calls?

04 A Yes.

05 Q Okay. So, you wouldn't see much going on
06 during the day because you were just so busy?

07 A Yes.

08 Q Okay. And do you understand that in the
09 documents that you've signed -- in this case, you
10 understand that you're claiming that you work 91 hours,
11 during the time that you were admitted to Holy Cross
12 Hospital for that week?

13 A I may have made that error, yes.

14 Q As far as SeaWater Pro, did Mike have
15 everybody work, full week nonstop Thanksgiving, the
16 Friday after Thanksgiving, the weekend after
17 Thanksgiving?

18 A Mike didn't want anyone of the business
19 working if they didn't want to work there, this was a
20 huge problem for us. Those employees would not come in
21 until maybe 11 o'clock in the morning, or Glenn would
22 always be there at 09:00.

23 If one employee wouldn't get there until 01:00, if
24 he bothered to show this was a constant issue, I always
25 complained to Mike about this. He knew -- I knew

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 131

01 something was going on with the employees because I
02 would see them go off in corners and everything else.

03 And I realized that -- the incessant talking and
04 then the days where one employee couldn't even speak, I
05 found out that he was a coke head. It was extremely
06 frustrating dealing with him.

07 Q Okay. My question was Thanksgiving week,
08 when you had Thursday of Thanksgiving, Friday after
09 Thanksgiving, and the weekend after Thanksgiving, was
10 SeaWater Pro open in having its employees work those
11 days?

12 A Thursday people were off, but Friday they
13 were working. But you can even look on Mike's reviews
14 on Easter Sunday, there's a review that we were
15 working.

16 Q Okay. And for Christmas, same thing. Mike
17 just gave off for Christmas Eve -- Christmas day?

18 A Christmas day -- no, not Christmas Eve.
19 Christmas day -- we were off Christmas day. We
20 actually had customers that came and celebrated
21 Christmas with us.

22 Q So, Christmas Eve work until 7, 8 o'clock --
23 at 6, 7, 8 o'clock at night for everybody in the shop?

24 A No, 05:00, I believe.

25 Q And then New Year's?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 132

01 A New Year's Eve worked.

02 Q New Year's Day?

03 A New Year's Day, I think we actually went in
04 too.

05 A And 4th of July?

06 Q 4th of July, we worked that day.

07 Q And so, the only day that you would have off
08 would be Thanksgiving Day and Christmas Day, two days a
09 year?

10 A Yes. We usually worked Memorial Day and
11 Labor Day also. If an employee did not want to come
12 in, like I said, Mike.

13 Q And so, during the time that -- your car was
14 lent out to an employee, and which employee was your
15 car lent out to?

16 A Dillon Stokes.

17 Q Okay. And during the time that your car was
18 lent out to Dillon Stokes, and then for the other eight
19 months that it was lent out to a customer, you were
20 going back and forth to work with either Mike or you
21 had arrived --

22 A With Mike. Yes, and realize that one in --
23 one customer had my car for four months. Another
24 customer had my car for -- that same customer had it
25 for another three months. A customer had it for over --

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 133

01 had six weeks.

02 Some customers might only take my car for an
03 afternoon or for a week. There were -- it wasn't just
04 one customer, it was multiple customers.

05 Q Okay.

06 A And I believe that even in some of the
07 reviews, they stated how they -- that we gave them a
08 loaner car when they came.

09 Q And that would've been during the -- from
10 like June of 2019 on?

11 A Yes.

12 Q Okay. And so, during this time when you
13 would go to work with Mike, other than when you would
14 ride your bike from LA Fitness, you would be on his
15 schedule as to when you would get there and when you
16 would leave?

17 A Yes. To go into the shop. He would leave
18 during the day because the noise from the CMCs, the car
19 was quiet, so he could make his phone calls there.

20 Q Okay. And then Mike would come back, pick
21 you up at the end of the day, and take you back home?

22 A Yes.

23 Q And as far as the time when you would spend
24 dealing with Mike's medications, was there a time when
25 Mike would keep his medications, any of them in a safe?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 134

01 A Yes. Part of it.

02 Q I'm sorry?

03 A Yes, he did keep the Ambien in a safe.

04 Q And did you access the medication in the safe
05 without his permission, break into it at all?

06 A Yes, I did.

07 Q And did you use that Ambien to take it
08 without Mike's permission?

09 A No, I had my own prescription.

10 Q Okay. So, why did you break into the safe to
11 get the Ambien?

12 A I did have a true Ambien or an Ambien
13 dependency. And if I ran out of my script, I would
14 take his.

15 Q And am I correct that Mike initiated
16 proceedings to get a restraining order against you in
17 2023?

18 A What month?

19 Q March?

20 A No.

21 Q When do you believe it started -- when do you
22 believe that the restraining order proceedings started?

23 A When Mike filed a Cyber stalking case.

24 Q When was that?

25 A I would have to -- the verdict of that was in

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 135

01 April in 2023.

02 Q I'll show you what I've marked as Defendant's
03 102.

04 (Thereupon, Defendant's Exhibit 102 was
05 entered into the record.)

06 MR. CUTHBERTSON: I have a copy of that.

07 A What month is that?

08 BY MR. POLLOCK:

09 Q This is a case search result from the Clerk
10 of Courts for Broward County, Florida. And if you
11 look, the third case down is Michael Spanos v. you.
12 You see that?

13 A Yes.

14 Q Okay. And do you see that the filing date
15 was March 24th, 2023?

16 A Then you're correct. It was March.

17 Q Okay. And then you said that as a result of
18 that Mike was able to get a restraining order against
19 you?

20 A Yes, he did get a restraining order.

21 Q And you indicated the date on that was
22 April 14th, 2023. I think, is that right?

23 A That's when he got -- he had the trial. He
24 actually got the trial within three weeks.

25 Q So, he got the trial or the hearing on that

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 136

01 quickly, and then the restraining order was entered
02 against you on April 14th, 2023. Is that correct?

03 A April, yes.

04 Q Do you remember the date in April?

05 A 14th.

06 Q Okay. And do you remember being served with
07 a copy of the hearing that was scheduled in the
08 restraining order proceeding, on March 28th, 2023?

09 A Yes, I think so.

10 Q Do you understand the restraining order to
11 still be in effect?

12 A Yes.

13 Q And then, you also discussed Cyber stalking.
14 What was your understanding of the Cyber stalking that
15 was claimed by Mike?

16 A The Cyber stalking was over the Facebook
17 page.

18 Q Okay.

19 A That the Judge awarded the ownership of that
20 page to SeaWater Pro.

21 Q And then if you look at Exhibit 102, there's
22 two other restraining orders that had been applied
23 for -- by Arya Jane and by Bailey, in January of 2023.
24 Do you see that?

25 A Yes.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 137

01 Q Did either of those go to a hearing?

02 A A hearing is?

03 Q If -- a hearing is where you go before the
04 Judge, and where a Judge takes either argument or
05 testimony.

06 A Yes, it did go to a hearing.

07 Q Okay. Which one? For Bailey or for
08 Arya Jane?

09 A They would try together.

10 Q Were you instructed to stay away from either
11 of them?

12 A Yes.

13 Q And through April 14th, 2023, is it true that
14 you had not sent Mike, any e-mail or letter or text
15 message, demanding any wages or back pay?

16 A I could not.

17 Q What do you mean, you could not?

18 A Okay. What are the dates again on that?
19 Hang on.

20 Q I don't think you can take notes and pass,
21 back and forth to your lawyer during a deposition.

22 A Oh, I'm sorry. I did not know that.

23 Q Especially during it -- while a question is
24 pending. And so, what I'd like to do is I'd like to
25 mark it as Exhibit 103, and we can have the Court

01 decide whether I'm entitled to it or not. No, no, to
02 the notes.

03 (Thereupon, Defendant's Exhibit 103 was
04 entered into the record.)

05 A But wouldn't this be --

06 BY MR. POLLOCK:

07 Q Not on the notes, please. I don't -- no, you
08 can't ask your lawyer questions or make comments during
09 a deposition while they're pending. So, my question --
10 you said that you could not send a letter, e-mail, or
11 text message demanding back pay after -- excuse me. At
12 any time before April 20th -- April 14th, 2023.

13 A There was a short time that I could
14 correspond with Mike, and I did ask if he was going to
15 resolve any of the issues, with the pay.

16 Q Okay. So --

17 A And that's when Mike said that not only him,
18 but my niece was going to -- try to reverse Mike's on
19 my expungement. That was in process.

20 Q And the expungement was for the misdemeanor
21 charge that was brought against you?

22 A Which misdemeanor charge?

23 Q I don't know. You said, there was an
24 expungement. Have you been charged with multiple
25 misdemeanors that have been expunged?

01 A You are only allowed one expungement per
02 misdemeanor.

03 Q Okay. So, which misdemeanor are you talking
04 about that you were trying to have expunged and did
05 have expunged?

06 A Mike called the police. And the police -- I
07 was arrested on a domestic violence charge, which the
08 Courts would not prosecute because Mike told on the
09 camera to the police I never touched him but he refused
10 to drop the charges.

11 Q Oh, this is a situation in which you were
12 claiming that Mike had hit you and had assaulted you,
13 right?

14 A I said that Mike had touched me during that
15 call, but he initially made that call --

16 Q Okay.

17 A -- to the police. I had never touched him.

18 Q Mike made the call to the police. You asked
19 for the truth?

20 A Yes. I did not call the police. He did.

21 Q Okay. And you asked after the police came
22 out that they arrest Mike, right?

23 A No, they arrested me.

24 Q I understand that they ultimately arrested
25 you.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 140

01 A Yes.

02 Q You had asked them to arrest Mike and accused
03 him of hitting you?

04 A No, I never said -- I asked him to arrest
05 Mike. Absolutely not.

06 Q Did you tell the police officers that he hit
07 you?

08 A I said his hands were on me. I did actually,
09 I -- now that I think about it, when I was going into
10 the police car, I did use the term, "hit."

11 Q And the reason why you were arrested and not
12 Mike is because there was a video.

13 A There's no video.

14 Q There was a recording of the incident that
15 Mike had on his phone. Is that right?

16 A There was a recording of me raising my voice
17 to Mike after finding \$10,000 cash, that he had just
18 returned from Greece with my niece. And he -- the
19 thing about it is on the recording, he said that he was
20 going to take me down.

21 Q Okay. And so, this misdemeanor, for which
22 you were arrested, that's you had expunged, right?

23 A Yes. But Mike threatened to reverse it, and
24 that's why I have three cases here.

25 Q And what prompted you, or what would've

01 prompted Mike to reverse the expungement? Like, what
02 upset him to your knowledge?

03 A There were several things that were going
04 back and forth, but he refused to compensate me for any
05 hours, duties, wages that I had earned. He just --

06 Q I understand that. But I asked you before
07 April 14th, so before the restraining order was
08 entered. You had not sent a letter, text, e-mail,
09 WhatsApp demanding back pay. Is that correct?

10 A No, there should have been -- there should
11 have been some text messages.

12 Q Okay. So, you would've sent text messages to
13 Mike from your cell phone to his demanding what?

14 A Well, there weren't a lot of text messages.
15 I was talking to him on the phone.

16 Q Okay. So, I'm trying to understand, because
17 you've told me that there's text messages, you told me
18 that they're on the phone. I'm just trying to find out
19 what exists that is in digital copy -- digital format,
20 or it's an e-mail, something we can look at and we
21 can't look at, what you talk about, unless it's written
22 down.

23 So, before April 14th, 2023, and I'm trying to get
24 a final answer, like we hit the buzzer, we get a final
25 answer. Is there a text or an e-mail or a letter or a

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 142

01 WhatsApp that you had sent to Mike demanding payment
02 for work that you claim to have done for SeaWater Pro?

03 A Not the one that I can find and produce.

04 Q Okay. And then after the restraining order
05 is entered, the first time that Mike would've heard
06 from you or on your behalf, that you were claiming
07 money for work, that you continued performed for him
08 and for SeaWater, was when he would've received the
09 letter from your lawyers. Is that right?

10 A If I had contacted Mike any other way, I
11 would've been in contempt of Court.

12 Q Understand.

13 A And he would've had me jailed.

14 Q And my question is, the first time that he
15 received any kind of a letter or text or e-mail,
16 anything in writing was from your lawyers when they
17 sent a letter demanding money from him in 2024 in June.
18 Is that right?

19 A At -- yes. That has to be right. That's the
20 way the Courts told me I had to do it.

21 Q Okay.

22 A And I abided by the Court's wishes.

23 Q Understand. But I mean, you --

24 A He had failed to respond to any of my
25 verbal -- to any of my verbal claims to please pay me.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 143

01 Q Okay. And did you ask him for -- to sell the
02 business and give you money for it?

03 A Mike was looking at to sell the business.

04 Q Okay. And so --

05 A But did I ask him to sell the business?

06 Absolutely not. He was so sick, he couldn't walk 25
07 feet at that time.

08 Q And if he -- and if he were to sell the
09 business, were you expecting to receive money from him?

10 A He said that he was going to give me money
11 for that.

12 Q Okay. When did this happen?

13 A This happened when we were living on Briny.

14 Q Okay. So, this would've been --

15 A He had four buyers actually for over two
16 million each. And that's not in my hours for going in
17 there and working, but it was there. And he knows that
18 Moji and Debbie can testify to that fact.

19 THE COURT REPORTER: Can you spell Moji?

20 THE WITNESS: M-O-J-I.

21 BY MR. POLLOCK:

22 Q Okay. And so, at what point did you leave a
23 Google review about SeaWater Pro?

24 A After Mike threatened to reverse my
25 expungement with the aid of Bailey.

01 Q So, the -- in the Google Review that you left
02 for SeaWater Pro, was a one star review that you left
03 in --

04 A Yes.

05 Q -- August of 2023?

06 A I believe so.

07 Q Was that in violation of the restraining
08 order?

09 A No.

10 Q Why not?

11 MR. CUTHBERTSON: Objection. Calls for legal
12 conclusion.

13 BY MR. POLLOCK:

14 Q What's your understanding as to why it -- you
15 were leaving a one star Google Review with commentary
16 about SeaWater Pro was not in violation of the
17 restraining order entered on April 14th, 2023?

18 A 2023? Wait a minute, let me see the date on
19 that. That's -- if you're saying 2023, that's wrong.

20 Q There's a review.

21 A Where the date on this?

22 Q Top right.

23 A This is when it's printed. This is not the
24 date of the review.

25 Q Bottom at -- that's the date of the e-mail

01 was received. Bottom right is the date that it was
02 looked at.

03 A I did not vol -- I did not violate -- I did
04 not violate that. I don't know why the date's here,
05 but I did not violate it.

06 Q Because when Google sends a review, as you
07 know, Google also sends you an e-mail indicating the
08 review you got and who you received it from and a
09 little snippet about the review.

10 And then if you click it, you can look at the
11 review and then you can comment on it, reply to it.
12 And so, what you have before you, the first page is the
13 e-mail that SeaWater Pro received once you sent the
14 review.

15 And it says that there was -- the review was
16 received by SeaWater Pro from you on August 29th, and
17 then it was printed, which was the bottom right hand
18 side of the page on August 31st, both of 2023.

19 A This review said it was two days before this
20 August 29th.

21 Q Correct.

22 A So, it would've been August 27th. And I
23 don't understand why the date is over here in this.

24 Q It would've been two days before it was
25 looked at --

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 146

01 A You're right.

02 Q And --

03 A You're right.

04 Q -- the looked at is at the bottom right of
05 the page. It's very small, but --

06 A And this is on 08/31. I'm trying to figure
07 this out.

08 Q Because 08/31, two days before is 08/29,
09 which is the date that e-mail was sent over.

10 A I don't know why this shows this way.
11 Because I'm telling you, I didn't violate my
12 restraining order. I wouldn't -- I didn't do that.

13 MR. CUTHBERTSON: Are you going to number
14 this?

15 MR. POLLOCK: Yes, we can do that.

16 A Trust me. Had I violated, he would've had my
17 butt back in the Court.

18 MR. POLLOCK: We can number it 104. I'll
19 make it a Composite.

20 (Thereupon, Defendant's Composite Exhibit 104
21 was entered into the record.)

22 BY MR. POLLOCK:

23 Q As far as the contents in the review that are
24 on Page 2 of Exhibit 104, that's what you wrote. Is it
25 not?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 147

01 A I don't know. I know it's true, but I don't
02 know.

03 BY MR. POLLOCK:

04 Q So, you don't know if you wrote the review?

05 A I don't know, because --

06 Q Can you say that please?

07 A Because the date --

08 Q Forget the date, contents, the review you
09 wrote it?

10 A I know it's true. I am not going to say I
11 did that.

12 Q Okay. You're not going to say that you wrote
13 the review?

14 A The date doesn't work.

15 Q Okay. The contents of the review, you agree
16 with, it's the date that you do not?

17 A I know the contents of the review to be true.

18 Q If that was a review you had written, do you
19 understand that that would've been sent to SeaWater
20 Pro?

21 A Of course.

22 Q Okay. I guess we can take a look at that
23 when we get the Google history that we requested.

24 Is your Facebook account public or private?

25 A Private.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 148

01 Q The encounter that you had with Mike -- let
02 me back up. After the restraining order was entered,
03 did you post any pictures or images or videos of Mike
04 on your Facebook account?

05 A After the encounter with Mike?

06 Q After the restraining order was entered on
07 April 14th, 2023?

08 A No.

09 Q Okay. Did you take down any posts of
10 pictures, videos, or images of Mike after the
11 restraining order was entered?

12 A I deactivated the Facebook page as the Judge
13 requested.

14 Q Okay. Answer to a different question than
15 what I asked.

16 A The YouTube videos were not part of that
17 judgment.

18 Q On your private Facebook account, did you
19 take down -- did you post any pictures, videos, or
20 images of Mike after the restraining order was entered
21 on your private Facebook account?

22 A Possibly. That was not part of the judgment.

23 Q Okay. So, it's your understanding that the
24 restraining order allowed you to post pictures or
25 images or videos of Mike on your private Facebook

01 account?

02 MR. CUTHBERTSON: Objection, calls for legal
03 conclusion.

04 BY MR. POLLOCK:

05 Q Go ahead and you can answer. Should, I mean,
06 you posted them, so you understood that you could do
07 it, right?

08 A I said possibly.

09 MR. CUTHBERTSON: Objection, form.

10 BY MR. POLLOCK:

11 Q Okay. After the restraining order was
12 entered on April 13th, '23, did you take down any
13 pictures or images or videos of Mike that had been
14 posted to your private Facebook account?

15 A I don't recall doing anything because I was
16 afraid -- completely afraid, but Mike assumed on some
17 of my post it was about him, which it was not.

18 Q Okay. So, when -- so, a picture depicting
19 Mike with his -- being led by a police officer, that
20 wouldn't be a post or a picture about him?

21 A That video -- one video actually showed me
22 working there at the business.

23 Q I'm not talking about that video. I'm
24 talking about a video of Mike being led by a police
25 officer. That wouldn't be a video about him, is what

01 **you're saying?**

02 A That video also had me in it. I wasn't
03 allowed when the State refused to prosecute my case.
04 Mike told everybody that I was released on a
05 technicality. The fact that I never committed the
06 crime was never -- I was never allowed to say that.

07 So, I left the video up for people to make their
08 own conclusion. I did not do -- I did not add to that.
09 I just put the evidence out there for people to see.

10 **Q You put the evidence out there that you**
11 **wanted people to see, right?**

12 MR. CUTHBERTSON: Objection, form.

13 A I put the evidence of the tape with the
14 police officer what actually happened and was said and
15 done. They can make their own conclusions. I didn't
16 add to that.

17 BY MR. POLLOCK:

18 **Q Okay.**

19 A This has nothing to do with the wage case.

20 **Q I will show what I've marked as Defendant's**
21 **Exhibit 105, which is marked -- numbered as Plaintiff's**
22 **1602 through 1606.**

23 (Thereupon, Defendant's Exhibit 105 was
24 entered into the record.)

25 MR. CUTHBERTSON: Do I have a copy of it?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 151

01 BY MR. POLLOCK:

02 Q Okay. This was included within documents
03 that you produced to us. What are we looking at?

04 A A system that I sold, that I pulled out of my
05 boat.

06 Q The picture is a picture of a Watermaker that
07 was installed on your boat?

08 A Yes. I pulled the Watermaker out of my boat
09 and I sold it.

10 Q Well, the question was the picture that we're
11 looking at, which is reproduced on each of your posts?

12 A Oh, no, you're right. The picture of the --
13 was of a unit -- of a unit that I took at the shop was
14 the exact unit. I don't know. It was not the exact
15 unit, but was the same parts, yes.

16 Q So, you took --

17 A A picture of the exact unit, that was in my
18 phone.

19 Q Let me ask you my question. So, you took a
20 picture that you had on your phone or was it a picture
21 that you found online?

22 A It was a picture I had on my phone.

23 Q Of a display or was this a display that was
24 in the front of the warehouse?

25 A Yes.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 152

01 Q Okay. And so, then you posted this on
02 different boating sites so that you could sell the
03 Watermaker that was on your boat?

04 A Yes.

05 Q And when you said it was refurbished, it was
06 refurbished by whom?

07 A Me.

08 Q You posted it when? On February 3rd, 2024?

09 A I posted it through Marketplace, which in
10 turn put it on these websites.

11 Q Okay.

12 A I only posted it one place, but it
13 automatically went out to these other websites. I
14 didn't do each one.

15 Q You posted it on February 3rd, 2024. Is that
16 right?

17 A It was around there, yes.

18 Q Okay. I'll show you what I marked as Exhibit
19 106, which is the Summons and Complaint.

20 (Thereupon, Defendant's Exhibit 106 was
21 entered into the record.)

22 BY MR. POLLOCK:

23 Q Have you seen the complaint before?

24 THE WITNESS: Is this one --

25 MR. CUTHBERTSON: You can answer that.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 153

01 THE WITNESS: Yeah.

02 A I believe so.

03 BY MR. POLLOCK:

04 Q Okay. Share what I've marked as Exhibit 107,
05 two-page Exhibit Demand Letter from your lawyers.

06 (Thereupon, Defendant's Exhibit 107 was
07 entered into the record.)

08 THE COURT REPORTER: And just for the record,
09 you said 7?

10 MR. POLLOCK: 107.

11 THE COURT REPORTER: Thank you.

12 BY MR. POLLOCK:

13 Q Have you seen this document before?

14 A This one, yes.

15 Q 1 -- 107?

16 A The Demand Letter?

17 Q Yes.

18 A I don't believe I saw the de -- Demand
19 Letter, no.

20 Q Okay. The -- if you take a look at Page 2,
21 since you hadn't seen this demand letter, explain that
22 this is a calculation that your lawyers have done about
23 the wages they're claiming that you're owed.

24 A Yes.

25 Q And are these hours, weekly hours or average

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 154

01 weekly hours worked correct?

02 A Yes.

03 Q And so, those are correct, even though during
04 COVID, you testified earlier that there was a week that
05 you wouldn't have worked 91 hours because you were at
06 Holy Cross Hospital for three days?

07 A Three days -- yes, three days. Yes.

08 Q Okay. And so, you still had managed to work
09 91 hours that week?

10 A Yes, actually I did.

11 Q Okay. And 91 hours is about 13 hours a day.
12 So, when you were looking at four days left, you worked
13 91 hours in four days?

14 A I actually, I went into the shop. I had to
15 pick up some things at the shop and Michael was
16 actually out of -- and he was in town or he went out of
17 town to San Juan and that's why he couldn't pick me up
18 with my niece to go to a show.

19 During that showtime is when Fred was coming in
20 and I was securing -- I was securing the boat, I was
21 taking care of stuff that needed to be done in
22 preparation for that Hurricane.

23 Q Okay. So, you're working 91 hours over four
24 days. You're working nearly 23 hours a day for four
25 days, right?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 155

01 A Four days, no.

02 Q No?

03 A For four days?

04 Q Yeah. Because you said you worked 91 hours
05 in the week that you were Baker Acted for three of
06 them. It only leaves four.

07 A Okay. I may have not have put in 91 hours
08 that week.

09 Q Okay. And then what about the week that you
10 were sailing on the boat with Mike in Greece and
11 another couple --

12 A That's not even -- that was pre these
13 employment wage times.

14 Q Okay.

15 A We went in 2000 and -- July of 2019. Prior
16 to this case.

17 Q If you look, this case goes back to June of
18 2019, so July would be included.

19 A Okay. Yeah, we --

20 Q So, --

21 A I still was working on the boat.

22 Q Okay. And then afterwards you were working
23 37 hours a week after February 27th. So, and that's
24 based on your working from 08:00 p.m. to 02:00 a.m.
25 basically every night?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 156

01 A Yes.

02 Q Okay. And you're claiming that Mike and his
03 company owe you in this letter at least a couple
04 dollars short of \$93,000 for which you don't have a
05 document you can show us to his in support of the hours
06 that you worked?

07 A All my documents were left in Mike's
08 possession, which he disposed of.

09 Q Okay.

10 A And he refuses to -- as far as I've heard,
11 he's refusing to present any of the documents where I
12 can show that I was the business signing checks and
13 stuff like that.

14 Q Okay.

15 A Or an e-mail because he has all that
16 information.

17 Q Okay. What you said is that he disposed of
18 records. What records do you believe he disposed of?

19 A I had some records at the shop in a container
20 and he told me he threw them out.

21 Q Okay. What records would you have had at a
22 shop in a container?

23 A I had leases that I had co-signed for and
24 showing that I was the emergency contact and hours that
25 I had some stuff scribbled down on papers of things

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 157

01 that I had done and hours that I'd worked and duties
02 that I was forced to perform.

03 Q When you say duties you were forced to
04 perform, what do you mean duties? You -- how did he
05 force you to perform them?

06 A My leg was broken and I was still packing
07 boxes.

08 Q When was this? What year?

09 A This was after the Lake Okeechobee trip
10 because I had a splinter fracture in my leg. Mike was
11 angry because I wasn't wearing shoes and I slipped on
12 the dock and broke my leg and he knew it.

13 Q And so --

14 A You can ask the bookkeeper. I was having to
15 pack boxes and put my leg up for the swelling to go
16 down.

17 Q Did you have to get diagnosed, go to a
18 doctor's office, get x-rays?

19 A He took me to the doctor. He was present.

20 Q Okay. Then you had to go to follow up visits
21 as well?

22 A Yes.

23 Q And those were during the workday?

24 A No.

25 Q They were after 07:00 p.m., the doctor's

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 158

01 office was open?

02 A I made a phone call because I didn't think I
03 needed to physically go in there. I knew that my leg
04 was broken. I knew that they weren't going to cast it.
05 So, I told the doctor that I was fine and just going to
06 continue through.

07 Q So, --

08 A Because he told me what was going to happen
09 for, to heal.

10 Q So, did you go to a doctor's office to get
11 diagnosed with a fracture of your leg?

12 A They did an x-ray, yes.

13 Q Okay. And so, you had to go to the
14 doctor's, -- you had to go to where a urgent care or a
15 doctor's office to do that?

16 A We went to a doctor's office. In the
17 doctor's office, we're still on our phones conducting
18 business. When the doctor was in the room, no, we
19 weren't on our phones.

20 Q So, you would've been on your phone
21 conducting business is what you're saying?

22 A Yes, we were both together.

23 Q Well, you said we were on our phones?

24 A Yeah, I was on my phone doing stuff and he
25 was on his phone doing stuff.

01 Q Okay. So, on your phone you did not have
02 Mike's SeaWater Pro --

03 A Yes, I did.

04 Q You had it attached to your phone?

05 A Yes.

06 Q Okay. And what happened to that phone? It
07 stopped working or you traded it in?

08 A That phone, we were -- he -- I had his login
09 and password for all of his e-mails.

10 Q Um-hum.

11 A So, I was sending direct from my phone.

12 Q Okay. And then what did you do with it
13 before you -- what did you do with that phone? The
14 physical phone?

15 A The physical phone, it was defective and I
16 had to turn it in to get my warranty claim.

17 Q When did you turn that in?

18 A That died in June of 2023, I believe.

19 Q Okay.

20 A Somewhere in there.

21 Q And you said that you had some records that
22 were in a shop at a container, Mike delivered that
23 container?

24 A No, he did not deliver that particular
25 container. I had several containers underneath the

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 160

01 nest. He delivered what he wanted to deliver and threw
02 away the rest, the rest including quilts that my great-
03 grandmother had made for me and pictures of my son's,
04 clothing, my car title was in that information. I
05 haven't got any of that.

06 Q And this would've been thrown away when?

07 A How would I know, it was in his possession.

08 Q Okay.

09 A He told me he disposed of it though.

10 Q Had you told Mike what was in the container?

11 The scribble down notes and hours worked duties perf --
12 duties that you were forced to perform? Did he have
13 any idea what was in there?

14 A Probably not.

15 Q Okay. In early February of '23 did you get
16 money from Dylan? Was he sending you money?

17 A '23?

18 Q Yeah.

19 A He did send me some money that Mike had sent
20 him.

21 Q Um-hum. How much did Dylan send you?

22 A \$3,000 if review the text message Mike said
23 that he wanted me to relocate back to Arizona.

24 Q And -- but you didn't relocate back to
25 Arizona, although you received the three -- the 3,000,

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 161

01 right?

02 A Yes.

03 Q Okay.

04 THE COURT REPORTER: Can we take a bathroom
05 break?

06 MR. POLLOCK: Yeah, sure.

07 (Thereupon, a short discussion was held off
08 record.)

09 (Deposition resumed.)

10 THE COURT REPORTER: We are back on the
11 record. Did we mark 108?

12 MR. POLLOCK: No, I missed it. I'll do it
13 this way.

14 MR. CUTHBERTSON: Sorry --

15 THE COURT REPORTER: Okay.

16 BY MR. POLLOCK:

17 Q Share what I've marked as Exhibit 108.

18 (Thereupon, Defendant's Exhibit 108 was
19 entered into the record.)

20 BY MR. POLLOCK:

21 Q Which is the Amended or Updated version of
22 your lawsuit, have you seen this document before?

23 A Yes.

24 Q Okay. Have you reviewed it to determine
25 whether it is accurate or not?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 162

01 A I believe it is.

02 Q And you see in the lawsuit at the paragraph
03 Number 12 is that, you're claiming that you were not
04 paid, "Full and proper minimum wages". Do you see
05 that?

06 A Yes.

07 Q And so that's your claim is that you weren't
08 paid minimum wages in this case?

09 A No.

10 Q Now, what's your claim?

11 A I was never paid any wages.

12 Q Okay. And so, are you claiming minimum wages
13 in this lawsuit or what are you claiming?

14 A I believe this is calculated on minimum wage
15 because I couldn't give her because we hadn't -- Mike
16 said that he would be fair on what he paid.

17 Q Okay. My question to you was what are you
18 claiming in this lawsuit?

19 A Wages.

20 Q Which wages?

21 A At least minimum wage.

22 Q Okay. What are you claiming beyond minimum
23 wage?

24 A Overtime.

25 Q And how much are you claiming in overtime?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 163

01 A With the -- on a 91 hour week that -- it
02 would be 41 hours in overtime. Excuse me.

03 Q Well, if you're referring to Exhibit A to the
04 Complaint document 28-1, according to this document,
05 the last time that you worked -- for claim to have
06 worked 91 hours a week would've been the week ending
07 February 26th, 2021. Do you see that?

08 A Yes. And that's correct.

09 Q Okay. So, -- and do you understand that
10 you're unable to recover for overtime that was worked
11 more than three years before the lawsuit was filed.

12 So, if you worked any overtime, it would've had to
13 have been, I know sometime in at least June of 2021
14 forward. And you're not -- and you're not claiming
15 that?

16 MR. CUTHBERTSON: Objection, calls for legal
17 conclusion.

18 BY MR. POLLOCK:

19 Q Right. You understand that you're not
20 claiming that you worked overtime since June of 2021?

21 A No, I didn't.

22 Q Okay. So, can we agree that any overtime
23 that you worked would've been more than three years
24 before you filed the lawsuit?

25 MR. CUTHBERTSON: Objection, form.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 164

01 BY MR. POLLOCK:

02 Q You can answer.

03 A I don't know the --

04 Q I'm not asking anything about the law.

05 A I explained my situation to my lawyers and my
06 lawyers created.

07 Q Right. I understand. I understand your
08 lawyers created the case. I understand the lawyers
09 created the documents. I'm ask -- I'm asking you if
10 you understand that --

11 A I'm not going to get compensated for
12 everything that I worked. I know that.

13 Q And you understand that you can't recover in
14 Court for overtime that was worked more than three
15 years before the lawsuit was filed. Do you understand
16 that?

17 A Yes.

18 Q Okay. And so, you said that you're claiming
19 at least minimum wage. Are you claiming anything else
20 besides the minimum wage and the overtime that we just
21 discussed?

22 A Not from this paperwork that I see.

23 Q Okay. Is there any other paperwork that I
24 should be directed to that contains any other claim
25 that you're making against Mr. Spanos and his business

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 165

01 for which we're here about today?

02 A For wages, not that I'm aware of.

03 Q And when you were living with Mike, do you
04 understand that if he hadn't paid for everything, that
05 your share would've been half of those living expenses?

06 A I never charged Mark -- Mike for the RV or
07 for the boat, nor did I -- Mike, cover the stays or the
08 gas for the RV. So, no we were a couple.

09 Q Okay.

10 A And we -- and when one could provide a
11 living, they paid for it.

12 Q So, the RV that was back in what, 2015, 2016?

13 A Yes.

14 Q Okay. And you said that you had cashed out a
15 retirement account and was that a -- and I don't know
16 whether that was a retirement account or whether it was
17 money you got from a divorce settlement?

18 A No, I cashed out my 401K plus I was working
19 full-time at that time.

20 Q Okay. And you purchased the RV, right?

21 A Yes.

22 Q You didn't have any payments on it?

23 A Yes, I had no payments.

24 Q Okay. So, --

25 A But when you park the RV at an RV park, you

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 166

01 have to pay rent on that parking spot. So, I was
02 paying for that. I was paying for the gas to go in the
03 RV.

04 Q I mean, the rented a parking spot for an RV,
05 depending on the ground that you're at could be a
06 couple bucks a day, right? It's a lot cheaper than
07 rent here in South Florida?

08 A In San Diego I was paying 1,350 a month. It
09 was going up to 1,875.

10 Q Okay. But while you were here in South
11 Florida with Mike, the slips, house, apartments,
12 condos, Mike paid for all that, right?

13 A I'm sorry, what? I --

14 Q Mike paid for all the living expenses while
15 you were here in South Florida?

16 A No. When we first got here, I paid for it.
17 The first part that we were here, I paid for it, and
18 then Mike did stopped paying for the boat. When we
19 moved on Briny, I was paying for the boat on Briny.

20 Q Okay. It was your boat, right?

21 A It was my boat.

22 Q And since, --

23 A And it was still being used and it was had
24 Mike's disposal if he ever wanted to show anybody a
25 demonstration for the watermaker on the boat or to take

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 167

01 the boat out.

02 Q And before that, you got a free watermaker,
03 right?

04 A That was a demonstration unit.

05 Q Okay. It was a SeaWater Pro demonstration
06 unit that you had installed on your boat, right?

07 A Yes.

08 Q And then after you and Mike were no longer
09 together, you sold it and you kept the money, did you
10 not?

11 A Yes, I did.

12 Q Okay. And between for all the other living
13 expenses from 2019 on other than a couple months for
14 the boat slip for your boat, Mike paid for everything
15 else, did he not?

16 A Technically.

17 Q I mean, technically or actually?

18 A He was paying for everything else, but I
19 wasn't getting any wages at all.

20 Q Okay.

21 A We were a couple. I never asked Mike for
22 anything when he didn't have anything.

23 Q When Mike didn't have anything, was he still
24 working for the -- was he working for the Navy at that
25 point?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 168

01 A No, there was also another business before
02 that which --

03 Q Okay. And so, in the last page of the
04 lawsuit, 28-1 that you had looked at earlier, it says
05 that your claim is for the total unpaid minimum wages
06 are \$81,583.41. Do you see that?

07 A Yes.

08 Q On the second to last column and when I look
09 at the last page of Exhibit 107, which is the
10 calculation of those same minimum wages for the same
11 period of time, it's a different number. Do you know
12 why that is?

13 A No.

14 Q It's 91,900 -- excuse me, \$92,911.35. Do you
15 know why those numbers are different?

16 A No.

17 Q Do you agree with me that the totals of the
18 unpaid minimum wages are different between Exhibit A of
19 the Amended Complaint, which is --

20 A The totals are different.

21 Q Okay.

22 A How's calculated I -- not completely sure.

23 Q Okay. And then do you see that the weeks
24 between June 16th, 2019 and December 31st, 2019 in the
25 Demand Letter Exhibit 107 says it's 28.43 weeks. Do

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 169

01 you see that?

02 A No.

03 Q In the horizontal one?

04 A Okay. So, we're looking at June 16th. Okay.

05 Q That last line.

06 A Yes.

07 Q It says weeks is 28.43.

08 A Um-hum.

09 Q You see that and then the total unpaid
10 minimum wages at the time, \$21,886.02 for that 28.43
11 weeks. Do you see that?

12 A Yes.

13 Q Okay. What's 0.43 of a week?

14 A A 40 hour week.

15 Q This is your Demand Letter. I'm just trying
16 to find out what 0.43 is of a week.

17 A It is almost -- it's a little over 90%. A
18 little.

19 Q 0.43 of a week is a little over 90% of what?

20 A Of a week. Of a 40 hour week.

21 Q Okay. But you're claiming you were --

22 A Is that was asking?

23 Q No, I'm just trying to find out. This is
24 your document. You have percent, you know, decimal
25 points of a week 0.86 of a week 0.7, one of a week,

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 170

01 0.14 of a week, 0.29 of a week and 0.43 of a week.

02 I'm trying to find out at least with respect to

03 the time of June 16th, 2019 to December 31st, 2019.

04 What's 28. -- what's 0.43 of a week, 0.43 of a week

05 can't be 90% of a week.

06 MR. CUTHBERTSON: Objection, form. Is there

07 a question?

08 BY MR. POLLOCK:

09 Q So, I'm trying to find out what's your

10 understanding, what's 0.43 of a week. This is your

11 claim, the Demand Letter that was sent on your behalf

12 to my client for over \$90,000. If you don't know, you

13 can say you don't know.

14 A I don't know.

15 Q Okay.

16 A I gave them the hours I worked and they put

17 it into a legal format.

18 Q Okay.

19 A To present I don't understand legal formats.

20 Never -- hence why I went to an attorney.

21 Q Understood. Same answer with respect to 0.86

22 of a week that you don't know?

23 A I would have to assume that there's 365 days

24 in a year that doesn't calculate directly into seven

25 days. There's more than if it was seven -- seven times

01 52 is not 395 -- 365.

02 Q Right. That's why once every four years we
03 add a day.

04 A Yeah.

05 Q So, I'm just trying to find out, this is
06 weeks, this is your document. Do you know what 0.86 of
07 a week is or no?

08 A I would assume it's for that -- for the leap
09 year. I don't know.

10 Q But a leap year comes one day every four
11 years you've got 0.86 of a week followed by the next
12 calculation has a 0.71 of a week. Do you know what
13 0.86 of a week is?

14 MR. CUTHBERTSON: Objection. Asked and
15 answered.

16 A I don't know.

17 BY MR. POLLOCK:

18 Q Okay. Is it true for the rest 0.71, 0.14,
19 0.429 you don't know what those are of a week, agreed?

20 A I don't know the calculations to get that,
21 no.

22 Q Okay. Do you know the reason for the
23 difference in numbers between Exhibit A to document
24 107, which is what we've been looking at and Exhibit A
25 to the Amended Complaint, which is 108.

01 So, the difference between the one that's
02 horizontal and the one that's vertical. Do you know
03 what the diff -- do you know why the two were
04 different? Why they have different totals for unpaid
05 minimum wages?

06 A Because this document doesn't go back until
07 June.

08 Q Okay.

09 A The dates were -- the dates worked it's
10 actually less dates worked on this Amended Document.

11 Q Do you know why that is?

12 A I assume it has to do some with statutes.

13 Q So, is this how much you're claiming in the
14 lawsuit for your minimum wages? Is it the \$92,911.35,
15 or is it the \$81,583.41 for the minimum wages you claim
16 you're owed?

17 A Since Exhibit or this is the Amended
18 Complaint, it would be the Amended Complaint that is
19 being filed for.

20 Q Okay.

21 A I don't know what happened to the weeks that
22 are not on this form.

23 Q I'll show you what I've marked as Exhibit
24 109.

25 (Thereupon, Defendant's Exhibit 109 was

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 173

01 entered into the record.)

02 BY MR. POLLOCK:

03 Q Have you seen this document before?

04 MR. CUTHBERTSON: You can answer.

05 A Yes.

06 BY MR. POLLOCK:

07 Q Okay. What's this document to your
08 understanding?

09 A It's for -- it's for more hours worked. I'm
10 assuming that this is for -- it's got some of the
11 months -- no, it doesn't have some of the months in
12 there. Honestly, I don't know how these tables were
13 configured.

14 Q Okay.

15 A I know that there was a table with that
16 showed the hours that I worked the times in and out. I
17 understood that table. It looked to be the same as
18 this.

19 Q So, let me ask you this. Your claim is all
20 based on what you had told your lawyers and what we're
21 talking about today.

22 And what you had told us today under oath is that
23 you typically, the most that you would work would be
24 Monday to Friday. It would be 09:00 a.m. to about
25 06:00 or 07:00 in the evening.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 174

01 A That's not what I said.

02 Q Okay. That wasn't the typical work week?

03 A No, I did not say that. I said the typical
04 work week was six days in the shop.

05 Q Okay.

06 A And then we worked after hours and on the
07 other day.

08 Q So, you were -- you would go in 09:00 a.m.
09 and work until about 06:00 or 07:00 and then Monday
10 through Friday and then you would -- and then you would
11 work?

12 A No, I --

13 Q Typically a Saturday.

14 A I said 09:00 to about 07:00 or 08:00
15 usually --

16 Q Okay.

17 A -- during the week and then 09:00 to 05:00 on
18 Saturday. And then on Sunday we were still on our
19 phones answering calls and everything like that.

20 It wasn't unusual to have a cruiser come in and
21 they would bring their dinghy in tie up and we might
22 end up spending the day with a cruiser or taking them
23 around or giving them by card to go. Like I said,
24 there's a review of us working on Easter Sunday.

25 Q Okay. I mean, and you can go in and meet

01 somebody, right? To go deliver a product or make a
02 product available to be picked up and then you can
03 leave?

04 A Yes.

05 Q Okay. And what you've told us is that you
06 would work, even if it's 09:00 a.m. to 07:00 p.m. or
07 08:00 p.m. Right? That's 11 hours of working, is it
08 not?

09 A Yes.

10 Q Okay. And then you work Saturday less hours
11 and Sunday less hours, right?

12 A Sometimes but during COVID we were going
13 in -- I mean this business grew incredibly fast.

14 Q I understand that.

15 A We didn't become -- Mike didn't become the
16 largest manufacturer in the US by working 09:00 to
17 05:00 week work -- work week.

18 Q I mean, he couldn't do it all himself if he
19 had to have people that worked with him, right?

20 A Yes.

21 Q And the only way to grow is to scale. Is
22 that right? In his business when you're selling a
23 product?

24 A Yes.

25 Q Okay. And when you're claiming you would

01 work, right? Because let's focus on you because that's
02 what the lawsuit is about.

03 You're saying that you would work up until COVID
04 09:00 a.m. until you'd leave the warehouse or the
05 storage unit 7 o'clock at night, typically?

06 A No. A lot of times it was later.

07 Q Okay. How much later?

08 A We -- there were nights that we were there
09 till 2 o'clock in the morning.

10 Q And I understand that there's occasional
11 nights that you would leave really, really late.

12 A Um-hum.

13 Q And we're talking about a typical work week
14 or typical work day. That wasn't typical, was it?

15 A 02:00 a.m. wasn't typical at the shop, but to
16 10:00 was typical, especially during COVID because
17 phones would quiet down and I could get more done at
18 the shop without phones and without visitors coming in.

19 Q Well, during COVID that was a couple months?

20 A No, COVID was much longer.

21 Q How long was COVID for you? What do you
22 consider COVID how long?

23 A COVID, Mike came down with COVID and once he
24 came down with COVID, he relaxed a little bit about it.
25 But Mike didn't come down with COVID until January of

01 2022.

02 Q Okay. So, Mike -- '22 or '21 because by
03 the -- by January of 2022, people had already received
04 vaccines, possibly multiple rounds.

05 A Yes. But he still wasn't very comfortable
06 with that.

07 Q Wasn't my question. Question was -- you're
08 talking about that you worked a lot more than the
09 typical 09:00 p.m. to 07:00 p.m. because you said COVID
10 was very busy.

11 A Yes.

12 Q And I'm trying to understand, when do you
13 consider to be COVID for your busy period? Was it
14 March of -- I mean, when you had March of 2020 --

15 A Before --

16 Q Hold on a second. Middle of March of 2020,
17 you're saying for the couple weeks after COVID started,
18 Mike's business went crazy?

19 A No.

20 Q Okay.

21 A We -- Mike doubled, at least when I was
22 working with him, doubled at least every six months.

23 Q Okay. But --

24 A Then once COVID hit we more than -- number
25 one, we were already doubling in two months. In that

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 178

01 first two months of the last time that I was going in
02 there, we had over \$1.4 million.

03 Q You were last going in there --

04 A And of that's, we were putting in all those
05 extra hours to get that. When I left, like I said, he
06 did not pull in another 1.4 million for 10 months.

07 Q Okay. I'm trying to understand. And you
08 talked about what you consider COVID. You're telling
09 me --

10 A COVID last --

11 Q Hold on a second. Let me ask my question,
12 then you can answer it. That's how this is going to
13 work.

14 I'm trying to understand from you when you say it
15 got really busy because my question immediately
16 proceeding this was, wasn't it really quiet during the
17 first couple weeks after COVID?

18 A No.

19 Q Okay. So, Florida shuts down.

20 A Yes.

21 Q In middle of March.

22 A Yes.

23 Q And then that next week, Mike's business goes
24 crazy?

25 A Yes.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 179

01 Q Okay.

02 A Preppers.

03 Q Okay. His business goes crazy. And so,
04 we're at a stay at home essential personnel --

05 A We were staying at home.

06 Q Okay.

07 A We were essential.

08 Q Okay. So, you're essential you're going
09 to -- at that point, was it a warehouse or storage?

10 A That was a warehouse 7,000 square foot
11 warehouse.

12 Q Okay.

13 A We weren't a small operation.

14 Q The 7,000 square foot warehouse was where
15 Dylan helped you move into?

16 A He helped move and then eventually came back
17 to work at.

18 Q And that was in July of that year?

19 A Yes.

20 Q So, the first warehouse was around 12 or
21 1,300 square feet?

22 A Yes.

23 Q And so, during that time it was a 12 or 1,300
24 square foot warehouse. And you're saying that you were
25 working at the warehouse from -- you're saying that

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 180

01 Mike would get there at 09:00 a.m. and he wouldn't
02 leave until 10 o'clock at night, 8 o'clock at night
03 when every day?

04 A Yes.

05 Q Okay.

06 A We were working.

07 Q When would he -- when would he leave?

08 A It depended on the day.

09 Q Okay. We don't have time records, do we?

10 A No, we don't.

11 Q Okay. So, on an estimate or an average, when
12 would you leave?

13 A Leave the warehouse. I've consistently said
14 07:00 in the 1,200 square foot warehouse 07:00. The
15 other one, it was a little bit bigger or a little bit
16 later, but Mike would actually pull up a lounge chair
17 and sleep in the lounge chair while I continue doing
18 assemblies.

19 Q Okay. So, you would leave on an average
20 Monday through Friday --

21 A But just because we left the show --

22 Q Hold on a second. You keep interrupting me.
23 And she's going to go nuts in a little bit. 09:00 a.m.
24 leave at 07:00 p.m. on average Monday through Friday
25 while you're at the 1,200 square foot warehouse during

01 COVID. Is that right?

02 A They were all approximates.

03 Q That's all I'm asking for. Is that correct?

04 You just told me you would leave at 07:00 when you were
05 at the 1,200 square foot warehouse.

06 I'm just trying to make sure that I understand
07 because this keeps changing and I don't want it to
08 change. I want to understand what went on.

09 So, tell me if I'm right, you would get there
10 sometime around 09:00, leave sometime around 07:00.
11 Working out of the 1,200 square foot warehouse from
12 COVID on Monday through Friday.

13 A We were still working past 07:00 a lot of
14 those nights.

15 Q At the warehouse?

16 A Yes.

17 Q Then why did you tell me you would leave
18 around 07:00?

19 A That was an approximation.

20 Q Okay. What's the best approximation for when
21 you would leave during those several couple months
22 after COVID, while you were still in the 1,200 square
23 foot warehouse?

24 A I put 07:00 because of the -- during the
25 week, we've worked longer days than on the weekend.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 182

01 Q Okay.

02 A But still, when we went home, we were getting
03 calls from Europe, we were getting calls from
04 Australia. I was still returning e-mails.

05 Q If you could focus on my question, because
06 you haven't answered it, you've answered four different
07 ways and I'm trying to find out which is what we can
08 rely on.

09 A Okay.

10 Q You would get there with Mike --

11 A Yes.

12 Q -- on average, sometime around 09:00 a.m.
13 during the couple months after COVID while you were
14 working out of the 1,200 square foot warehouse, right?

15 A We'd get there at 09:00, yes.

16 Q Okay. And then -- and you would go with Mike
17 in his car?

18 A Yes.

19 Q Okay. Then you would leave the warehouse
20 around what time Monday through Friday? I'm just
21 trying to find out what time was an approximation, an
22 estimate or an average of when you would leave that
23 1,200 square foot warehouse during the couple months
24 after COVID, before you moved Monday through Friday?

25 A Usually after 07:00.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 183

01 Q Okay. When after 07:00 -- it -- after 07:00
02 means 07:01 to midnight when?

03 A That varied on the day and the business that
04 came in during that day.

05 Q And for that reason, I've asked for an
06 estimate --

07 A And it also depended on how Mike felt. If
08 Mike was tired, we had to go home earlier.

09 Q Okay.

10 A If Mike could rest in the recliner, then I
11 got to stay later.

12 Q And for that reason I asked for an estimate
13 or an average. What's the estimate or average? Is it
14 7 o'clock?

15 A I put 07:00.

16 Q Okay.

17 A As far as -- in my head, 07:00 was a good
18 point. Then there was other things that I could do.
19 You know, I could take work orders and fill them out at
20 home from the orders that came online or I could, or
21 Mike would ask me a question and then I would make
22 notes that I had to complete that assignment for the
23 next day. But all we did was work during that time.

24 Q Well, you worked -- you -- working included
25 taking the boat from Okeechobee down, right?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 184

01 A That was during Thanksgiving weekend.

02 Q Okay. And did you have time for dinner?

03 A We didn't go out.

04 Q Well, you can --

05 A We might pick up takeout to go on the way
06 home.

07 Q Okay.

08 A I did not cook.

09 Q Was the time that you would leave the
10 warehouse to go to pick up, take home, and then go
11 home, was that work time?

12 A Yeah, normally Mike was on the phone in the
13 car because it was quieter in the car, the machines
14 held at the shop.

15 Q That's Mike working. Mike -- you've
16 established that Mike pretty much worked around the
17 clock?

18 A Yes, but I was always eavesdropping to know
19 without -- because whatever he was saying, I had to
20 ship the next day or I had to be aware of it.

21 Q You had to ship the next day or be aware of
22 it. Wouldn't there be a -- an order, wouldn't there be
23 a document where somebody had purchased something and
24 there'd be a document to reflect what was ordered so
25 that way we didn't have to rely on someone's memory for

01 what would be shipped out?

02 A Like I said --

03 Q Yes or no?

04 A The automation had to grow as the business
05 grew.

06 Q Understand. But when there was a purchase
07 order, there would be a document reflecting what was
08 purchased?

09 A The purchase order was for vendors, not for
10 customers.

11 Q Okay. Would be a sales receipt --

12 A Mike consistently threw in freebies to
13 customers.

14 Q Okay.

15 A And he would not that there was not a place
16 to denote that on the online order.

17 Q Right, because there'd be an online order
18 that would be taken?

19 A Yes, and I would have to send e-mails to
20 clarify, like on the online order, it said that they
21 would order a panel, but for months we couldn't pick
22 the color of the panel on the online order.

23 So, I had to return a call and everything else.
24 If Mike said that he was going to throw in a diverter
25 valve, there was not a place to stipulate that on the

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 186

01 order online. When people wanted to order, Mike didn't
02 take the order manually, usually he said go online and
03 make the order.

04 **Q Understood.**

05 A So, there were things that were missed, which
06 was drove me crazy. So, I constantly was eavesdropping
07 on his phone calls because he would put them on speaker
08 so that I could hear what was going on too.

09 **Q And so, how many hours a day or a week were**
10 **you working?**

11 A I was available to Mike.

12 **Q Okay.**

13 A All day.

14 **Q So, --**

15 A There were times when things would get quiet
16 and I didn't have to do as much, but you know, we
17 were -- before we hired Trevor, you know, like I said,
18 we had huge months that --

19 **Q And my question was how many hours a day or a**
20 **week would you -- were you typically working during**
21 **that time for the first couple months of COVID on while**
22 **you're in that 1,200 square foot warehouse?**

23 A Well, when I was in the 1,200 square
24 warehouse, I was spending four to five hours a day on
25 the phone talking to UPS to find out what customs were

01 open, what were closed.

02 I was also, you know, calling customers and
03 saying, okay, we did a lot of France ordered several
04 units, the beginning of COVID. So, they were working
05 our typical 09:00 to 05:00 days.

06 So, I was getting return e-mails and stuff like
07 that later on at night. And then I would make
08 arrangements that if I wasn't shipping to France, then
09 I would ship to Italy because they could go to Italy
10 across the border and pick up there.

11 Q And again, that translated to how many hours
12 a day or how many hours a week? Because you're telling
13 me about things that you did, how long it would take on
14 to do something like, you know, find out who was open
15 for COVID and what countries you could ship to and not,
16 that doesn't tell me how many hours a day or a week you
17 were working on average.

18 So, I'm trying to find that out. How many hours a
19 day or a week were you working on average during this
20 period of time that we're talking about where you were
21 at the warehouse on average 09:00 a.m. to 07:00 p.m.
22 How many hours in total were you working?

23 A 09:00 to at least 07:00 we were at the shop.

24 Q I understand. I'm asking how many hours a
25 day were you working on average Monday through Friday

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 188

01 during that time. Without telling me what you did in
02 the course of the day, I just want to know a number or
03 an average of the hours worked per day?

04 A We were doing 09:00 to 07:00 at the shop and
05 I would say easily another four hours after the shop.

06 Q Okay. And the four hours was, you're
07 including time that you would call people or speak with
08 them or exchange e-mails as well as the time that you
09 were eavesdropping on Mike and available?

10 A Um-hum.

11 Q That's a yes?

12 A Yes.

13 Q Okay. And then on the weekends, how much
14 were you working on the weekends on Saturday and on
15 Sunday?

16 A It varied on who was come -- customers coming
17 in after --

18 Q On average, because we don't have time
19 records and we can't go day by day. If your lawyers
20 would like to, I can go day by day, but I think it'd
21 take a while.

22 A Okay.

23 Q Basically, so let's deal with averages and
24 estimates.

25 A When we would go in, even if we wanted, if

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 189

01 Mike say that we would only go in for a couple hours,
02 we would still show up at 09:00 and then something
03 would happen so, we were still there until at least
04 06:00, 05:00 or 06:00 in the after or in the evening at
05 least one of those days a week.

06 Then after that we would go home and we were still
07 having because initially after COVID most of our
08 business was exports. France ordered a ton of stuff.

09 Mike was also on the phone to India. He would --
10 while he was on the phone with India, he would ask me
11 how many pressure regulators we had left and stuff like
12 that. Then he was redesigning the website --

13 Q And sorry to interrupt.

14 A We had Sheldon coming over to our house.

15 Q But my -- you're asking -- you're telling me
16 about all these things that Mike was doing and other
17 people were doing.

18 And my question to you was on the weekend, how
19 many hours a day were you working on average on a
20 Saturday, on a Sunday. You said one day we would work
21 09:00 a.m. until --

22 A At least another 30. Usually, another 30.

23 Q Another 30?

24 A Yes.

25 Q Okay. And again, that would include the same

01 kind of time where --

02 A Wait, no, I can't say that on. It was --
03 that's six, sorry, not 30. I'd say at least another
04 20. A little over 20. I missed -- I didn't carry one
05 right.

06 Q And so, were you saying that once COVID
07 started that's really when you started working more
08 than before?

09 A We were working a lot --

10 Q Not my question.

11 A -- out of the warehouse. We worked even
12 harder once COVID started.

13 Q My question was, once COVID started, were you
14 working more than before?

15 A Yes.

16 Q Okay. And so, what we should see in your
17 estimates is working less up until COVID, agreed?

18 A No.

19 Q Okay. So, if you were working more after
20 COVID, how come you weren't working less before?

21 A Because we more than doubled during COVID.
22 We were already growing.

23 Q That -- what does that have to do with your
24 hours if you're working more hours --

25 A Because money --

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 191

01 Q Hold on a second. If you're working more
02 hours, once COVID started, right? That's what you
03 said, that's a yes?

04 A Yes.

05 Q You're working more than before. It means
06 you were working less, does it not?

07 A The work changed.

08 Q It may have changed, but the hours that
09 you're working, that's what we're talking about. You
10 worked more hours once COVID started than before.

11 A Yes, I did work more hours.

12 Q Okay. So, if you worked more than before
13 COVID, we should see on the estimates that you have
14 less hours, shouldn't we? On your estimates of how
15 much you worked?

16 MR. CUTHBERTSON: Objection, form.

17 BY MR. POLLOCK:

18 Q Agree, yes, or no?

19 A On the estimates, I don't agree with that.

20 Q Okay. So, you told us several times, once
21 COVID hit, it was basically like a bonanza for Mike in
22 the business. You're working around the clock, you're
23 working --

24 MR. CUTHBERTSON: Objection.

25 BY MR. POLLOCK:

01 Q -- 09:00 to 07:00 plus four hours at home,
02 plus you're working another 20 something hours on the
03 weekends, right? That's what you told us. And that's
04 more than you were working before COVID, is that
05 correct?

06 A We were still working very hard before COVID.

07 Q Not my question. My question was --

08 A You want to see the hours change? I'm
09 telling you the hours actually got more over COVID, but
10 I didn't ask for more hours.

11 Q Okay. So, you were working more than what
12 you're claiming is 91 hours a week?

13 A Yes.

14 Q Okay. And then before COVID, you were
15 working 91 hours a week?

16 A Yes.

17 Q And then during COVID you consistently
18 continued to work 91 hours a week?

19 A I worked more.

20 Q More. How come you didn't claim it?

21 A I thought the claim would look ridiculous if
22 I claimed anymore.

23 Q You don't think 80 or \$90,000 looks
24 ridiculous?

25 MR. CUTHBERTSON: Objection, form.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 193

01 A I don't think it looks ridiculous at all.

02 BY MR. POLLOCK:

03 Q Okay. And the money that Mike paid towards
04 all of your living expenses that we -- that can be
05 quantified for which you were have responsible, that
06 doesn't factor into any of the money that you're
07 claiming, does it?

08 A No.

09 Q Okay.

10 A It didn't qualify -- that didn't qualify into
11 anything. When I've cashed out my retirement and he
12 didn't work for over eight months while we traveled
13 here --

14 Q But Mike didn't --

15 A -- That was our relationship.

16 Q Okay. Mike didn't get --

17 A When one could provide, we provide it. His
18 status of living had to go up exponentially with the
19 pay that he got. I never wanted to move to that house
20 over off of Bel Air. He knew I hated that place.

21 Q So, you didn't -- so, you decided I'm not
22 staying there, I'm not going to enjoy the house. The
23 view, the rooms nothing, right?

24 MR. CUTHBERTSON: Objection.

25 A And the rats and the worms. And --

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 194

01 BY MR. POLLOCK:

02 Q So, you moved out --

03 A No air. Yes, I did for a little bit.

04 Q And then you moved back in?

05 A When he couldn't walk 25 feet. Yes, I did.

06 Q Okay. And Mike paid for the whole time?

07 A He paid for that house. Yes, he did.

08 Q And for the time that you had the RV, Mike
09 didn't make a claim for any kind of money for helping
10 out or doing whatever he could do?

11 A No, he did not. Why would he?

12 Q And so, if you weren't living with Mike, you
13 would've had to pay for your own living expenses, would
14 you not?

15 A Yes, but I would not have lived the
16 extravagance that he did.

17 Q You wouldn't have taken the trips to Greece
18 with him, right? You would've been able to do that?

19 A That was part of the business. He needed me
20 to go to Greece because he needed another captain on
21 that vessel.

22 Q And so, Mike couldn't have hired, there's no
23 captains that are available in Greece that are licensed
24 to operate a sailboat and take it for two weeks?

25 MR. CUTHBERTSON: Objection, form.

01 BY MR. POLLOCK:

02 Q Is that what you're saying? That the only --
03 the only thing they rent in Greece are bare bone
04 charter of sailboats?

05 MR. CUTHBERTSON: Objection, form.

06 A That is not what I'm saying.

07 BY MR. POLLOCK:

08 Q Okay. Because you can get a fully chartered
09 sailboat where they provide a crew, right?

10 A You are right there.

11 Q Okay. So, Mike didn't need you?

12 A Yes, he did need me.

13 Q He wanted you there, right?

14 A Wasn't Mike still in charge of my hours and
15 duties at that time? I was the youngest one on the
16 boat. Who do you think was pulling the line? Who do
17 you think was dropping that anchor?

18 What about the two couples that couldn't continue
19 the sail because they got too seasick and had to take a
20 ferry back. How is he going to get that boat alone
21 when he can't pick up 20 pounds?

22 Q So, was you and Mike --

23 A And on top of it, once we were halfway there
24 on that trip, Mike came out and told me that he
25 couldn't produce his passport, his Greek passport,

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 196

01 because he had a warrant out for his arrest since he
02 didn't do his service to his country.

03 So, yes, he needed somebody with a documentation
04 to be on that boat. I didn't know that.

05 Q And so, you didn't know that you thought you
06 were just going to Greece to sail around the Greek
07 Isles for a couple weeks, right?

08 A No, we had customers on the boat.

09 Q Okay. And customers who happen to also be
10 friends.

11 A Yes, that's true. But this is quite common
12 in business practices.

13 Q Right.

14 A To entertain clients.

15 Q Right.

16 A So, this was an entertainment trip, which I
17 did do.

18 Q Okay.

19 A And there's nothing wrong with that as a part
20 of business.

21 Q No, I mean --

22 A I was at -- I did what Mike told me when he
23 told me to do it.

24 Q Okay. So, when Mike said --

25 A Definition of a boss.

01 Q So, when Mike said, "Hey, let's go have
02 dinner and drinks", that was work that you should be
03 paid minimum wage for while in Greece having dinner at
04 a restaurant?

05 A Absolutely.

06 Q Okay. And while you're enjoying a -- while
07 you're docked up and swimming because you've got
08 customers who happen to be friends there for that time,
09 you should be paid hourly.

10 A Absolutely.

11 Q Okay. And your company, Salty Blue Fun that
12 has a website is there a reason why you have Mike in
13 the pictures on your website?

14 A It's a good picture and it shows the boat
15 very well.

16 Q And you can't take other pictures of the
17 boat. I mean, is there a reason why you're using
18 Mike's picture?

19 A There's nothing wrong with using Mike's
20 picture.

21 Q Did you get his permission?

22 A No.

23 Q Okay.

24 A He still has my photo though on his websites.
25 He never asked for my permission.

01 Q There's videos that you posted on the web --
02 that you posted on social media, right?

03 A Yes, there is.

04 Q Okay. And those pictures are from 28 --
05 those videos are from 2018?

06 A Which videos in particular are we talking
07 about?

08 Q Well, or any of them from after 2018 that you
09 produced in this case. There is three videos that you
10 produced.

11 A Yes. There is a video after 2018 produced.

12 Q Okay. Is it the only one that's 2019, is the
13 early part of 2019, right?

14 A No, there's one after. There's one of us in
15 the boat demoing. We're demoing the unit and you'll
16 see me turn it on and off.

17 Q Okay.

18 A Then you'll also see the video on the dock.
19 Where I was -- I did a really rough.

20 Q Assembly?

21 A Just demonstration of how to use the portable
22 unit.

23 Q And the longest video that was produced was
24 12 minutes and 50 seconds. Is that right?

25 A I would not know. I would have to look.

01 Q Okay.

02 A But you don't -- you don't get to get away
03 with first pa -- or the first take, have to make four
04 or five takes.

05 Q Okay. So, five takes 12 minutes talking
06 about an hour?

07 A Yeah, but you're only talking about a video
08 being produced. You're not talking about the other
09 jobs that I performed.

10 Q Okay. I'm just trying to understand what the
11 videos show other than, you know, either you unpacking
12 something, which I think you only do once when you
13 unpack a box and then you assemble it, that you do
14 once, you have to do multiple takes of that.

15 A Yeah, you do. When we were doing that video,
16 the landscapers started with their leaf blowers. Mike
17 had a conniption. We had to wait for the leaf blowers
18 to stop to finish the video.

19 Q That was from 2018. Who cares?

20 A Well, you're the one that brought it up, not
21 me.

22 Q Okay. So, when you're talking about your
23 hours, you're saying that, you know, 91 was being
24 generous with the hours that you were working?

25 A It after -- especially after COVID. Yes, I

01 am saying that.

02 Q Okay. And that Mike should get no credit for
03 any of the expenses that he paid for you while you two
04 were living together here in South Florida, right?

05 During --

06 A Yes, I am.

07 Q What living expenses does he get credit for?

08 A No, I said that he sh -- we were a couple.

09 It was part of our agreement as a couple.

10 Q What was the agreement? When did you have
11 that?

12 A It was the way it started with us. Sh -- if
13 there was a -- if we were dividing living expenses, why
14 did Mike not pay for anything with the RV?

15 Q I'm just asking --

16 A Why did he not pay anything for, on buying
17 the boat? I mean, he wouldn't have just had to cover
18 living expenses for the dock fee. He would to have
19 make a payment on the boat. That's not how our
20 relationship worked. That was a relationship.

21 Q Well --

22 A And on top of it, he told me that he was
23 going to pay me for my hourly wage. I never received
24 that.

25 Q Oh, he did -- when did he tell you that?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 201

01 A He misstated multiple times that he was going
02 to reimburse me for my time. He never did that. I
03 made multiple demands. He kept skating the issue.

04 Q He said he would reimburse you for your time.
05 How was he going to reimburse you for your time? Did
06 he -- was he specific?

07 A That I would get paid. As I'm sitting
08 they're writing checks out for everybody else, I'm
09 like, must, you know, I go to Mike and it's like, you
10 know, these people are getting paid 25 an hour. I'm
11 not even figuring this out at 25 an hour. And they're
12 putting in less hours than I am.

13 But yet they've got the ability to go out and buy
14 things. Whereas I didn't have the ability to go out
15 and purchase any big dollar item by myself.

16 Q You didn't have the ability to go out and
17 purchase a big dollar item by yourself. But you could
18 do it with Mike.

19 A I didn't buy anything with Mike. Mike's the
20 one who was out buying all the luxury cars and the
21 boats and the toys. If I wanted something like that,
22 Mike would've never approved.

23 Q Did you try? Did you try to use the -- a
24 debit card or a check to buy things for yourself?

25 A I didn't spend anything out of that account

01 without his approval.

02 Q Yeah. That wasn't my question. My question
03 was, did you try to purchase items for yourself with a
04 debit card for that account that you were on with Mike
05 or a check from the account you were on with Mike and
06 see what happened. Did you try?

07 A No, because to me that was considered theft.

08 Q Okay. And did you ever sit and add up how
09 much money Mike spent for your half of your living
10 arrangements over the past -- during the five years
11 that are at issue in this lawsuit? Was it two years or
12 three years, whatever the Court decides, you ever added
13 it up to see how much he spent on your behalf?

14 A No, I didn't, but at the same time, I didn't
15 think we needed to live to that extent. I thought we
16 were living beyond our means. And I stated that again
17 several times. And like I stated, I never wanted any
18 part of that house.

19 Q Okay. How about the apartments?

20 A But he demanded that we lived at that house.

21 Q And the condos?

22 A The first condo, I didn't want to move. I
23 thought it was too soon after moving to the larger
24 warehouse. I was con -- I was extremely concerned
25 going to a payment of 980 a month to a payment of 330

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 203

01 or 3,300 a month when we just signed a thing for the --
02 I believe we were paying over seven grand for the --
03 well, it was going up to seven grand for the warehouse.

04 Q When you moved and the rent went up bigger
05 place?

06 A Yes, we moved off the boat into a condo.

07 Q And then from the condo to a house?

08 A Yes.

09 Q And each time it got nicer?

10 A No, the house sucked.

11 Q House was more expensive?

12 A Yes. But Mike had to live there.

13 Q And from there it was to a condo on the
14 beach?

15 A Yes, it was.

16 Q And once Bailey came back in and you stopped
17 going into the office, you said that was when your
18 hours were 08:00 p.m. to whatever 02:00 a.m.?

19 A Yes.

20 Q Okay.

21 A It -- there wasn't a single hour that was
22 accounted for when I went into the shop. And saw how
23 the shop was being misrun. Shouldn't all these text
24 messages --

25 Q The condo that you moved into, did -- who's

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 204

01 the one that ended up finding that for the two of you
02 to live, was that -- didn't you find that condo?

03 A No. Well, which condo are you talking about?

04 Q The one on the beach.

05 A I did find that condo. Mike was looking up
06 buying a condo in the -- in a high rise and he couldn't
07 make it from the parking lot to the elevator, because
08 it was too far of a walk at that time.

09 Q On --

10 A His heart condition had escalated.

11 Q Show you what I've marked as Defendant's 110.

12 (Thereupon, Defendant's Exhibit 110 was
13 entered into the record.)

14 BY MR. POLLOCK:

15 Q Have you seen those before you as your
16 responses to our written questions?

17 A I think so.

18 Q Are those true and accurate?

19 A I believe so.

20 Q You believe so? Are they --

21 A Yes.

22 Q -- can we rely on them as the truth or not?

23 A Yes.

24 Q Okay. In your answer to Number 3, it was
25 identifying people who have knowledge about the claims

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 205

01 alleged in the lawsuit.

02 A Yes.

03 Q You worked with Bailey while you were at
04 Seawater Pro or claiming you worked for SeaWater Pro.
05 Is that right?

06 A Yes.

07 Q Okay. Did you identify Bailey as a witness?

08 A No.

09 Q Okay. What about Arya Jane. Do you identify
10 her as a witness?

11 A I have only met her in a courtroom.

12 Q Okay. But Bailey, you didn't?

13 A No.

14 Q Even though she not only worked at SeaWater,
15 but she lived with you?

16 A Yes.

17 Q Why not -- why didn't you identify her as a
18 witness?

19 A I didn't have to. There are several
20 witnesses that I didn't call.

21 Q You didn't have to? Why didn't you have to
22 identify her as a person with knowledge?

23 A I have customers that would testify that I
24 worked there, but I don't list every customer.

25 Q Okay. So, there's more witnesses whom you

01 haven't told us whether in the initial interest --
02 interrogatories or the amended answers?

03 A Yes, there are quite a few more.

04 MR. POLLOCK: Okay. Dillon, can we get those
05 supplemented?

06 MR. CUTHBERTSON: Can you show her the
07 amended?

08 MR. POLLOCK: Yeah, I'll get to those.

09 THE COURT REPORTER: Can we get the spelling
10 of Arya Jane?

11 MR. POLLOCK: A-R-Y-A J-A-N-E.

12 THE COURT REPORTER: Thank you.

13 BY MR. POLLOCK:

14 Q And then in your answer to Number 6, which
15 ask for legal proceedings, you didn't identify your
16 divorce as a legal proceeding. Is there a reason why?

17 A I didn't hire an attorney for my divorce.

18 Q Did you have to go to Court to get divorced?
19 Have a Judge approve it?

20 A You are absolutely right. I also had to go
21 to Court for my son's adoption. Excuse me.

22 Q The misdemeanor that wasn't identified on
23 here either, is that because you had it expunged?

24 A Yes.

25 Q And then your testimony or your answer in

01 response to interrogatory Number 9, is that the only
02 payment you ever received from my clients from
03 January 1st, 2019 to December 31st, 2022 is a check for
04 \$600 that you did not deposit. You would agree with me
05 that that's incorrect. Wouldn't you?

06 A No.

07 Q Okay.

08 A These claims were for wages, hours and wages.
09 I was never paid for hours and wages.

10 Q Okay. In your answer to Number 10, you
11 indicate that Mr. Spanos regularly communicated to you
12 that he and his company would pay you back the money
13 they owed you. What money did they owe you?

14 A They owed me four hours in wages.

15 Q Okay. Because the next sentence is,
16 "Plaintiff was never paid properly paid for the hours
17 she worked or the wages Plaintiff was owed." So, these
18 last two sentences, the money you're owed is the same
19 as the hours you're claiming you worked and the wages
20 you're claiming you're owed, right? It's all the same.

21 A Which sentence are you talking about?

22 Q Are -- your answer to question Number 10.

23 A Yep.

24 Q It says "Spanos communicated to Plaintiff the
25 Defendants would pay her back the money they owed her."

01 And talking about the money they owed, you're referring
02 to wages, right?

03 A Yes. He never paid me for the age -- wages
04 and he never paid me for, when I was just paid for the
05 boat slip fees when the business couldn't afford to pay
06 it. But that was okay, that was a relationship.

07 Q Okay. Then you said that you demanded
08 payment once, and your answer's here Number 11. So,
09 did you only demand payment from Mike once in 20 --
10 December of 2022?

11 A No, I demanded payment several times. He
12 only produced a check at one time.

13 Q Because the question was, "Describe every
14 instance in which you demanded payment from Defendants
15 for work you allegedly performed. Including the dates
16 of these demands and the responses received". And in
17 your answer to Number 11, it was this one time in
18 December of 2022.

19 And now you're telling me, and you've told me
20 today, that you've demanded payment on other occasions.
21 So, --

22 A Yes, I had, this was the only demand that he
23 acknowledged with a check.

24 Q Okay. Is there a reason why you didn't,
25 besides the fact that he didn't offer a check, identify

01 any other instance when you demanded payment from them
02 as requested in this question Number 11?

03 A An oversight on my behalf.

04 Q So, the answer to Number 11 is part right
05 part wrong?

06 A Yes.

07 Q So, when else besides December of 2022 or
08 when before then, did you demand payment from Mike?

09 A Almost every time that I had to give out a
10 payroll check. Seeing the money that everybody was
11 making, knowing that they were padding hours. And I
12 was not making anything.

13 Q So, for -- you would demand payment from Mike
14 52 times a year, over how many years, we're talking
15 about over a hundred and something times, maybe two.
16 You would demand payment from Mike every week?

17 A I would say, where's -- what am I making out
18 of this? Where's my money?

19 Q Okay. And so, as a result, you just decided,
20 I'm just not going to -- I'm going to keep working?

21 A Yes, I believed in him.

22 Q Okay. And was it your expectation that you
23 weren't going to get paid hourly, that instead you were
24 just going to get a part of the business. For helping
25 build it? Was that your expectation?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 210

01 A He didn't put in -- he did not put my name on
02 the LLC.

03 Q That wasn't my question. Question was, was
04 it your expectation that for the time that you put into
05 the business you were going to get a piece of it?

06 A I thought I was going to get wages and a
07 piece of the business, yes.

08 Q Okay. So, after three, four years of not
09 getting wages, what -- when was it that you thought you
10 were going to get paid wages?

11 I mean, you've asked him 50 times the first year,
12 50 times the second year, still haven't gotten paid.
13 At what point did you think you were going to get paid?

14 A That's why I kept asking.

15 Q Okay. And you kept getting the same answer.
16 So, why did you have an expectation that you were going
17 to get paid?

18 A Because I trusted him. We had a history and
19 I trusted him.

20 Q But you trusted him about what? That he was
21 going to pay you on the 217th time, but not the 216th?

22 MR. CUTHBERTSON: Objection, form.

23 BY MR. POLLOCK:

24 Q What did you expect to change?

25 A I expected it.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 211

01 Q You expected it?

02 A Yes.

03 Q And so for that reason, you waited until, or
04 no, 15 months after or 16 months or 14 months after a
05 restraining order was entered against you before you
06 first made a claim for wages?

07 A How much longer should I have waited? I
08 thought I waited long enough.

09 Q Okay. Why wait?

10 A Mike had made payments and I thought that he
11 was going to do something right. He did not do that.

12 Q Mike made payments. You're talking about the
13 \$3,000 a month?

14 A Yes.

15 Q Okay. And how come you don't account for
16 that in your answers?

17 A Because that was not a wage claim.

18 Q What was it for?

19 A That was for me to get out away from him. He
20 destroyed a lot of my property. He had done horrible
21 things to me.

22 Q Okay. And so, he was paying \$3,000 a month.
23 That doesn't get factored into what you're claiming you
24 owed. Did Mike just make gratuitous payments? I mean,
25 there was --

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 212

01 A Yes.

02 Q Okay. I mean, he -- there was no promissory
03 note, there was no document or agreement that required
04 Mike to make any payments to you whatsoever, was there?

05 A There was a seven year relationship.

06 Q Wasn't my question.

07 A That I put everything I had into him and
08 didn't come out of it. I was getting in fact, he
09 compared it to the alimony that I was receiving from my
10 ex-husband thinking that he was doing me a favor by
11 paying the lesser amount of my alimony.

12 Q You indicated your alimony was 1,800 a month,
13 about?

14 A Not at the end. It went down to 1,500 a
15 month.

16 Q And Mike was paying you 3,000 a month?

17 A Right.

18 Q And so, there was no agreement or contract
19 that required Mike to make any payments of you -- to
20 you?

21 A And that's exactly what I asked.

22 Q Is that correct?

23 A I had asked for a contract in writing. He
24 failed to produce it and stopped making payments.

25 Q Did you send him one by e-mail or text or

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 213

01 anything?

02 A No. Mike had sent a nice not that little --
03 he had threatens me with a law reversing my expungement
04 and another lawsuit on top of it the lawsuit from
05 Bailey and AJ.

06 Q Mike threatened you with a lawsuit, meaning?

07 A To reverse my expungement.

08 Q Well, the lawsuit to find you in contempt for
09 not complying with the Judge's orders, for posting
10 about him online. Is that what you're talking about?

11 MR. CUTHBERTSON: Objection, calls for legal
12 conclusion.

13 A No.

14 BY MR. POLLOCK:

15 Q What lawsuit?

16 A The \$3,000 payments were before the lawsuit
17 was filed.

18 Q Right. So, --

19 A And then he files the lawsuit. He stops
20 paying and makes the lawsuit. I did not violate my
21 control -- my Court order by the no contact order.
22 Whether it's right or wrong, I didn't know if an
23 attorney could contact him direct because I thought it
24 was a violation of that no contact order. I am not
25 well versed in legal matters.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 214

01 Q And you know, then we have this whole thing
02 where you wouldn't accept money from Mike, so he paid
03 it to you through your son, another \$3,000, right?

04 A You'd have to ask Mike that. That's what he
05 did.

06 Q And then --

07 A If he's paying it through my son, doesn't
08 that mean he thinks I'm entitled to something?

09 Q Or you would refuse to take the money from
10 Mike, so instead he filed it for your son. Is that
11 what your son's going to say that he got the money from
12 Mike to pay to you?

13 A My son's not going to lie.

14 Q Okay. Yeah. And so, besides the answers to
15 the written questions then -- that we went through,
16 then we have the revised version, the amended version
17 where in a second bite at the apple to go ahead and
18 provide these answers.

19 I'll show you what's marked as 111, which is your
20 amended responses to our first request for information.

21 (Thereupon, Defendant's Exhibit 111 was
22 entered into the record.)

23 BY MR. POLLOCK:

24 Q And in this one for the -- your revised, your
25 prior responses to include a revised answer to request

01 number -- to interrogatory Number 6 or Question 6 which
02 you have on your amended is Number 1, which is the
03 legal proceedings. And those are the same?

04 A No, actually it's not. Or -- all right.
05 Yes, you're right. I'm sorry.

06 Q Okay. And then --

07 A Oh no, we had to add the credit card debt.

08 Q And then the amended answer right is the
09 credit card debt. And then you also amended, but you
10 didn't add your divorce proceeding.

11 A Like I said, it was an oversight.

12 Q Okay. And you didn't add the misdemeanor
13 charge?

14 A Misdemeanor was expunged. But I also didn't
15 order my adoption for the -- my son.

16 Q Okay. And then for the witnesses for Number
17 2, you didn't identify Bailey in that one, did you?

18 A I told you I have more witnesses, I just
19 didn't produce them.

20 Q Okay. I mean, the question asked for all of
21 your witnesses. At what point are we entitled to
22 receive the names and what each one you believe knows.

23 A I have --

24 Q At what point?

25 A I can give you more than 10. I do have a

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 216

01 longer list. If Mike wishes for all of those witnesses
02 to be deposed, okay.

03 Q Have you talked to your son, Dylan about how
04 he got the money that he sent to you?

05 A Yes, I did.

06 Q And what'd he tell you?

07 A The truth.

08 Q He told you that Mike sent it to him?

09 A Yes.

10 Q Okay. Did he tell you why Mike had to send
11 it to him instead of directly to you? Did you talk to
12 him about that?

13 A Yes.

14 Q And how you wouldn't accept it from Mike, but
15 you took it from Dylan?

16 A Yes.

17 Q And why wouldn't you -- why didn't you take
18 it from Mike?

19 A I asked Mike to put something in writing.

20 Q Okay. And he -- you asked him to put
21 something in writing, sent him a text or anything to
22 ask that?

23 A No.

24 Q Did Dylan show you the text messages that he
25 had with Mike?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 217

01 A He sent me partial of a text message.

02 Q Okay. I'll show you what I've marked as
03 Defendant's 112, which is SeaWater 251 through 256.

04 (Thereupon, Defendant's Exhibit 112 was
05 entered into the record.)

06 BY MR. POLLOCK:

07 Q The last page you likely have not seen, which
08 is 256, but tell me if you've seen 251 through 255.

09 A No, I have not seen that. I -- the first
10 time I saw this complete text thread was in the
11 paperwork that I received for this Deposition.

12 Q Okay. Which part of this conversation, this
13 text conversation between Mr. Spanos and your son Dylan
14 did you see?

15 A The first part.

16 Q So, you only saw the screenshot of the first
17 page?

18 A Yes.

19 Q You didn't see anything from the second?

20 A No. And this isn't the beginning of the
21 first part of the thread. If you look.

22 Q It goes above where Dylan says her ego is in
23 the way?

24 A Yes.

25 Q Okay. Did you end up moving in with Dylan?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 218

01 A No.

02 Q Besides the \$600 check and the \$1,100 that we
03 talked about earlier, did you receive any other
04 transfers of money directly from Mike or SeaWater since
05 June of 2019?

06 A Transfers?

07 Q Sure.

08 A On bank accounts?

09 Q Yes.

10 A Not that I'm aware of.

11 Q Okay. Have you reviewed your bank accounts
12 to determine whether you received transfers from Mike
13 or his business?

14 A I glanced over them, I did not see anything.

15 Q Okay. Until when was Mike a civilian
16 contractor for the Navy?

17 A December of 2018. I am sorry,
18 December of 2017.

19 Q And how are you sure that Mike worked for the
20 Navy as a civilian contractor through 2017?

21 A Okay. Was -- repeat that again.

22 Q You said that Mike worked -- you said it was
23 your understanding that Mike worked as a civilian
24 contractor through the -- for the US Navy through 2017.
25 Why do you believe it was 2017 and not later?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 219

01 A I'm mistaken. In 2015, we met -- we spent
02 that first year in Arizona in 2016, we traveled. We
03 left Arizona.

04 We spent eight months getting to Florida, 2017.
05 You know, he worked the year of 2017. Because when
06 the -- he initially started with Navy as a -- he was
07 with a temp agency, then they converted over and then he
08 was let go in December.

09 Q Let go in December of which year? 2017,
10 you're saying?

11 A I believe so. '16.

12 Q So, you're saying that Mike wasn't working
13 for the Navy when he was starting SeaWater from his --

14 A He started SeaWater Pro while he was in the
15 Navy. He used to brag to customers how he was working
16 for the Navy and taking calls for SeaWater Pro while he
17 was working. We created that video on YouTube right
18 after he quit the Navy.

19 Q So, your Wells Fargo account -- you haven't
20 paid, according to the lawsuit that filed against you
21 since April 9th, 2024.

22 A Unfortunately.

23 Q And then two months later you filed this
24 lawsuit against Mike, right? And his company? Within
25 two months of not stopping -- not paying your Wells

01 **Fargo credit card, you sue Mike and his business?**

02 A I was speaking to them, but yes, that's how
03 the timeline worked. I wasn't even aware of the case
04 against them until Dylan told me, I received no
05 notification.

06 Q And the last statement you received or the
07 statement that was sent to you dated April 9th, 2024
08 from Wells Fargo indicated that you owed them just
09 under \$22,000, right? That you had in debt?

10 A The debt that I actually looked at them was
11 less than that, but I assumed with the charges, the
12 Court fees and everything, they were awarded that.
13 Like I said, I was never notified of that going to the
14 Court.

15 Q Have you looked at that lawsuit?

16 A No, I have not seen that lawsuit.

17 Q Have you been served with it?

18 A No, I was never served.

19 Q I will mark as Exhibit 113, the complaint
20 filed by Wells Fargo Bank, NA against you.

21 (Thereupon, Defendant's Exhibit 113 was
22 entered into the record.)

23 A I've never seen this.

24 BY MR. POLLOCK:

25 Q Attached to this lawsuit as Exhibit C is a

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 221

01 statement that Wells Fargo claims have sent to you?

02 A What are these --

03 Q Up at the top, page before, keep going.

04 Before that. Had you received this statement from
05 Wells Fargo?

06 A No.

07 Q I'm sorry?

08 A No.

09 Q Do you have online access to your Wells Fargo
10 account?

11 A Yes, I do.

12 Q Did you log into your Wells Fargo account and
13 look to see what your balance was on your credit card?

14 A Yes, I did.

15 Q Okay. And it says that as of the issuance of
16 this statement, your balance was \$21,889.60. Do you
17 see that?

18 A Yes.

19 Q And that's because you had a prior balance of
20 \$21,363.27 that was due based on the prior statement?

21 A Yes.

22 Q Okay. So, you hadn't been paying your credit
23 card for some time. How long had it been since you
24 were paying your credit card?

25 A Two months.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 222

01 Q So, your balance for the bill that was --

02 A I believe two months.

03 Q Because on this statement for which a payment
04 is due on May 4th, 2024, the only charges to that
05 account were fees and interest.

06 So, are you saying that in the month before that's
07 when you incurred the rest of the debt?

08 A No.

09 Q Okay.

10 A It grew.

11 Q I'm sorry?

12 A It grew.

13 Q It grew over time?

14 A Yes.

15 Q Okay. Over how much time did that debt grow?

16 A Maybe a year-and-a-half.

17 Q And so, from the previous balance that you
18 incurred for the statement that would've ended in
19 April -- excuse me, the statement that would've ended in
20 March because this statement looks like it goes from
21 March 11th until sometime in April, right? At the top,
22 March, 11th, '24 to April something of '24. That's
23 what this statement is for the one that's attached as
24 Exhibit C.

25 A Okay. I see it. Yes.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 223

01 Q Okay. This statement that would've closed on
02 March 10th, you didn't make any payments toward that,
03 did you?

04 A No.

05 Q And why did you stop making payments?

06 A I didn't have the money.

07 Q Did you go back to teaching Pilates in order
08 to try to earn the money?

09 A As much as I could, yes.

10 Q And what about the trips that you took to The
11 Bahamas since you and Mike stopped seeing each other?

12 A I had captain's jobs.

13 Q I will show you Plaintiff's 303. I'll mark
14 it as Exhibit 114.

15 (Thereupon, Defendant's Exhibit 114 was
16 entered into the record.)

17 BY MR. POLLOCK:

18 Q That's your handwriting?

19 A It's not my handwriting.

20 Q Okay. What's the significance of that
21 document that you produced in this case?

22 A I produced this document.

23 Q It says Plaintiff 0303 indicates it was
24 produced by you. Do you know what the significance of
25 that document is, if any?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 224

01 A No. I don't have any TV.

02 Q Is that TV that you had at Mike had at the
03 house or the condo or the apartment? I --

04 A There's no date on this. I don't.

05 Q I'm just trying to figure out what it is.
06 Because you produced it. If you don't know, you don't
07 know.

08 A I don't know.

09 Q Okay. I'll show you what I've marked as
10 Defendant's 115, which is Plaintiff's Number 230.

11 (Thereupon, Defendant's Exhibit 115 was
12 entered into the record.)

13 BY MR. POLLOCK:

14 Q What's the significance of that document?

15 A That's inside of a boat. I believe that was
16 Gates boat.

17 Q Okay. Why did you produce it?

18 A Proof of work. Probably.

19 Q Proof of what work?

20 A This was a customer, and this -- he had the
21 Karcher pressure washer, which -- this is also the
22 couple that we went to Greece with.

23 Q So, the Karcher pressure washer would've been
24 used in the early --

25 A Yes.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 225

01 Q So, it would've been sometime in 2018?

02 A Yes.

03 Q Okay. Did Mike also pay for -- or contribute
04 for your son Dylan's lease for a place to stay?

05 A Dylan and Bailey stayed with us.

06 Q Okay. Did he also contribute to their own
07 personal living expenses, why? For their own
08 apartments?

09 A He told me that he was going to pay for
10 Bailey's apartment if he did. I'm not sure. Dylan, he
11 never paid for Dylan's apartment or anything. I mean,
12 if there was a meal, yeah, he paid for the meal.

13 Q Why would Mike have transferred \$2,000 to
14 your bank account in August -- late August of '21?

15 A I believe that was -- I believe that was a
16 reimbursement because he didn't have a company check or
17 a personal check for a down payment on -- or to hold a
18 home.

19 I would have to look into that further to know, to
20 remember exactly.

21 Q I mean, it just -- I mean, were you moving
22 into another place?

23 A Yes.

24 Q Late August of 2021?

25 A We were looking for another place because the

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 226

01 condo that we were renting was -- '21.

02 Q Okay.

03 A The condo that we were renting was bought out
04 by some investors and they wanted us out earlier.

05 Q I mean, what you're saying is this isn't --
06 there was a prior occasion where Mike had transferred
07 money over to your account.

08 You said that was because he didn't have checks
09 personal or business checks available?

10 A And I had one in the car.

11 Q Okay. Same thing in '21 -- August '21.

12 A August '21 was about when we were looking for
13 another place.

14 Q Okay. And you had said that when Mike had
15 transferred in April of 2020, the \$100 and \$1,000, that
16 was the same reason?

17 A Yes.

18 Q Okay. And then when Mike transferred
19 \$3,052.99 to you on --

20 A I have no idea what that's for.

21 Q Okay.

22 A That I never saw that amount going to my
23 account.

24 Q Besides doctor's appointments for your
25 fracture of your leg and at Holy Cross, what other

01 medical appointments have you attended between June of
02 2019 and when you left Mike in '22?

03 A I believe there was one doctor's appointment
04 that actually Mike had his doctor's appointment right
05 after it that we attended together.

06 Q When was that?

07 A I don't know exactly. I had really bad
08 insurance. So, I didn't go to the doctor.

09 Q What kind of doctor was it?

10 A Just a primary.

11 Q Did you accompany Mike to other doctor
12 appointments of his?

13 A Absolutely.

14 Q How often would that occur?

15 A Quite often. I mean, I went to his primary
16 with him. I went to the cardiologist with him. I went
17 to the electrophysiologist with him. I went to the CHF
18 doc. I stayed at the hospital with him.

19 And he had two cardiologists, one at Cleveland and
20 then another one over by Holy Cross, yeah, we were
21 always at doctor's offices.

22 Q And it's your testimony that while you're at
23 the doctor's office, while you're in the waiting room,
24 while you're in with the doctor, in with the nurse,
25 you're working that whole time because you're on the

01 phone or you're available?

02 A I said I was available.

03 Q Okay. And for you work means that you're
04 available, right? That's what you consider to be work
05 time being available?

06 A Not all the time, but it's quite a bit of the
07 time, yes. Who honestly wants to spend a whole
08 afternoon at the doctor's office.

09 Q Well, sure. But when you're there with your
10 significant other, it's one of the sacrifices you make,
11 right?

12 MR. CUTHBERTSON: Object to form.

13 BY MR. POLLOCK:

14 Q Isn't it? One of the sacrifices you make is
15 going to medical appointments with those you care
16 about?

17 A Yes, it is.

18 Q Okay.

19 A But the extent was overwhelming. And on top
20 of it, Mike's mental capacity, especially when he is
21 not feeling well, diminishes quite bit.

22 Q Okay. I mean -- and so, because Mike has to
23 go to a lot of doctors and because, you know, his -- he
24 doesn't cope with it really well, when he's not feeling
25 well.

01 Does that change in your mind, accompanying a
02 loved one to work? Does that change the nature of what
03 you're doing, just because Mike's not feeling well or
04 he has to go to a bunch of doctors?

05 A Actually, my workload goes up because I'm not
06 at the shop doing things.

07 Q Your workload goes up the next day when you
08 have to go back in and pack boxes that weren't packed,
09 or it goes up while you're at the doctor's with him?

10 A My work time goes up because yes, I'm not --
11 I wasn't there.

12 Q And you weren't there because, you were doing
13 something else with Mike during the day while you're
14 waiting in the waiting room to get called in and then
15 see the doctor and then have to check out and you have
16 to drive back and forth, right?

17 A Yes.

18 Q And none of that's work time. Is it?

19 A That's not true. Mike is -- in the car, Mike
20 is always on the phone. Mike is on a call. In fact,
21 he'll put the -- he would've actually, make doctors
22 wait because he was taking phone calls.

23 Q When you were driving to these doctor's
24 appointments, Mike was in the driver's seat?

25 A Yes.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 230

01 Q And so, you're a passenger while Mike's on
02 the phone talking to customers and whatnot?

03 A Yes.

04 Q And you're just available in case he asks you
05 to do something real quick?

06 A No. Sometimes, I was doing things in my
07 phone responding to e-mails or WhatsApp messages.

08 Q And so, where do you draw the line between
09 what you were doing with Mike in your personal life and
10 what was business?

11 MR. CUTHBERTSON: Objection, calls for legal
12 conclusion.

13 MR. POLLOCK: You can answer.

14 A When Mike would turn off his phone.

15 BY MR. POLLOCK:

16 Q Okay. When would Mike turn off his phone?

17 A Late night.

18 Q How long were the Pilates classes last --

19 A One hour.

20 Q -- that you would teach?

21 A One hour.

22 Q And you'd have to get there, how long before
23 was the requirement from LA Fitness?

24 A 10 minutes.

25 Q And then you'd have to bike from your

01 apartment to LA Fitness?

02 A Um-hum.

03 Q That's a yes?

04 A Yes.

05 Q And then you would bike from LA Fitness over
06 to the warehouse?

07 A Yes.

08 Q And the time that you were biking over to LA
09 Fitness teaching, punching in and punching out and
10 bike -- biking back to SeaWater, that's all time that
11 you agree is not work time for SeaWater, right?

12 A I do agree.

13 Q And so, in your mind, the only distinction
14 between what's personal life and what you're doing for
15 business, or for work for SeaWater Pro is based on when
16 Mike would turn his phone off?

17 A Or when he would -- basically yeah --

18 Q Okay.

19 A -- for him, he has to turn it off because
20 he's constantly plugged into his phone.

21 Q And that's Mike's work. And then let's talk
22 about yours. So, when you go out on Mike's boat and
23 you film a video to demonstrate the -- a portable
24 watermaker, and then you go to the Sand Bar and you
25 hang out or you go to the ocean side and hang out, how

01 much of that is work and how much is not work? I mean,
02 when you're hanging out on a tube next to the boat, is
03 that work?

04 A No.

05 Q Okay.

06 A That happened very rarely after COVID, very
07 rarely.

08 Q But -- going on the boat happened rarely,
09 once COVID started?

10 A Yes.

11 Q Wasn't that the safest place to be? Was that
12 on the boat away from people?

13 A Yes, it is.

14 Q And one of the videos you sent over was you
15 and Mike on a boat.

16 A I was taking orders from Mike about starting
17 that watermaker.

18 Q Okay.

19 A That was making a video. I was under his
20 direction.

21 Q And the video, that was with the portable
22 unit was about two minutes and 19 seconds?

23 A Yes. But it took several takes, and it's not
24 very good.

25 Q So, it's like maybe 10 minutes. It took

01 **several takes?**

02 A No, I took a -- it was a couple hours.

03 Q **A couple hours?**

04 A Yes.

05 Q **A couple hours by the time you untied the**

06 **boat, idled out of where you were docked out to the**

07 **Oceanside --**

08 A Now which portable are you talking about, the
09 one that was mounted on the boat?

10 Q **There was one that was on the back of the**
11 **center console.**

12 A Okay. That one took much longer. It took 45
13 minutes to get out to the inlet.

14 Q **Okay.**

15 A And then out there, we did several takes and
16 then Mike was fiddling around with the unit because he
17 wanted to optimize the performance. And then yes, he
18 jumped into the water on a raft.

19 Q **Okay.**

20 A And then we came back.

21 Q **And you were hanging out in the water too?**

22 A I was hanging out on the water, but on the
23 way back I was taking videos, which I later posted on a
24 small video somewhere on one of the social media sites.

25 Q **Okay. So, you go up and back to hang out in**

01 the water and then for a period of time, 10 or so or
02 whatever minutes, you film one video of the portable
03 unit operating?

04 A It took longer than 10 minutes to do that.

05 Q 15?

06 A I don't know the -- I didn't have a time card
07 that I punched in there, but it -- we got out there and
08 there was Mike, there was something an issue that he
09 needed to remedy before we shot the video.

10 Q I'm just trying to get an understanding as to
11 how long in this day when you're out on the boat you
12 were working because if you say you're shooting a video
13 and you had to take multiple takes, and the video that
14 you produced was two minutes 19 seconds long.

15 I'm trying to find out how much time you spent
16 recording these videos of which you provided us with
17 one?

18 A Recording videos and actually getting the
19 footage are two things. Because, like I said, there
20 was an issue, Mike had to tighten some adapters before
21 the video was shot because it was leaking, I believe.

22 Q Was it shot on your phone?

23 A I don't know what phone that was shot on.

24 Q Okay. Do you know where the other versions
25 of the video are that weren't produced?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 235

01 A It's either -- it was on the phone that was
02 taken, whether it was my phone or his phone.

03 Q Okay. And what we have is one video for two
04 minutes and 19 seconds. What I'm trying to find out is
05 on that boat day, how long were you recording for, if
06 one video was less than two-and-a-half minutes and you
07 had to do a couple different takes, how long was that?

08 A I would say shooting the video was about an
09 hour.

10 Q Okay.

11 A Now the photographs and the synopsis of the
12 day, that was just coming in and out of the port.

13 Q Okay. So, you're taking a picture?

14 A It took longer. Taking a picture? Yes. But
15 transportation to get where you need to go.

16 Q Well, transportation to get from where you
17 were to the ocean takes?

18 A 45 minutes from where we were and 45 minutes
19 back.

20 Q Because you're not going to hang out and jump
21 in and -- in the intercoastal?

22 A No.

23 Q So, you're going to jump in the ocean?

24 A Correct.

25 Q And so, while you're going back and forth,

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 236

01 you can snap a couple pictures in the port, right?

02 A Yes. I --

03 Q Okay. And that's what you did?

04 A Yes.

05 Q And you're saying that whole day was a work
06 day, you should be paid for all of it?

07 A No, I didn't say the whole day.

08 Q Okay.

09 A Part of the day I should have been
10 reimbursed.

11 Q For 15 or 20 minutes that you guys were
12 taking pictures of the watermaker running?

13 A There is the time --

14 MR. CUTHBERTSON: Objection.

15 A -- to get out there.

16 BY MR. POLLOCK:

17 Q So, the whole time to get out there, that
18 wasn't part of fun. That wasn't just, let's run it
19 while we're out here. That's -- the whole purpose of
20 the whole day is just to run the watermaker and then
21 you just discount the time you're in the water. Is
22 that what you're saying?

23 A Yes.

24 Q Okay. And that's what you're going to tell
25 the Jury that the whole time to and from the ocean so

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 237

01 you can hang out in the water, that's all work time,
02 just discount the time that I was hanging out in the
03 water?

04 A Yes.

05 Q Okay.

06 A It's not a crime to enjoy your work.

07 Q As far as your cell phone records, we asked
08 for your record -- for your phone records from
09 September 26th, 2019 to June 30th, 2022. Was the phone
10 in your name at that time?

11 A No. It was in Mike's name.

12 Q The whole time, from September to June?

13 A Yes.

14 Q Okay. Is the phone in his name now?

15 A No.

16 Q Whose name is in -- is it?

17 A It's in my name.

18 Q Okay. Can Mike access a phone that's not in
19 his name? Could he -- does he have a login for it?

20 A He deleted all the information on my phone
21 remotely one time --

22 Q Okay. It wasn't my question.

23 A -- so yes.

24 Q He can log into your -- to the account even
25 though he's not on it at all?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 238

01 A Which account are we talking about?

02 Q Okay. Your phones, you had two phones,
03 right, there was one --

04 A I didn't have the -- my second phone until
05 after we -- after, I was no longer working with the
06 business.

07 Q 0840, right, that was the phone that we're
08 talking.

09 A That was the primary phone that I had while I
10 was with Mike, yes.

11 Q And that's the phone that was transferred to
12 your name, right?

13 A Yes.

14 Q And so, transferring it to your ma -- name
15 means you're the account holder. Is that right?

16 A Yes.

17 Q And so, Mike is not on that account anymore.
18 Is he?

19 A No.

20 Q And so, Mike can't access that phone account
21 with Verizon. Can he?

22 A No.

23 Q Only you can?

24 A Yes.

25 Q And so, when your answer to my request for

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 239

01 your phone records is none, why is that?

02 A Because Mike -- a part of the business he was
03 paying -- what date are you asking the for -- phone
04 records from?

05 Q Okay. Right now, you're the only one --
06 okay.

07 A On these phones? Yes.

08 Q Right. So, you're the only one who can
09 access the phone records?

10 A When I was with Mike --

11 Q Not when you're with Mike, now, right now, if
12 we were to ask the phone company if Mike were to try to
13 log in, he couldn't log in and access your phone
14 records. Do you agree?

15 A The phone records? It should only be me,
16 yes.

17 Q Okay. And so, we've asked for those and you
18 indicated none. Why is that? Don't you have access to
19 your own phone records?

20 A Where's the request?

21 Q Request Number 46 and your amended response
22 that was served on us.

23 A And the date range for those?

24 Q Hold on, excuse me. On January 17th, which
25 would be last Friday was none. The date range is

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 240

01 September 26th, 2019 to June 30th, 2022. We asked for
02 you to provide us with your phone records.

03 A This are under my -- that Mike was still
04 paying the cell phone bill.

05 Q Correct. But we asked now, Mike doesn't have
06 access now?

07 A But Mike had -- I changed when I went to my
08 new phone that was under Cricket, I changed to a whole
09 different provider.

10 Q Okay.

11 A That's -- so I can't go back to those phone
12 records. He was primary.

13 Q So, from September 26th, 2019 to
14 June 30th, 2022, the provider at that time was Cricket?

15 A Yes.

16 Q And so, since you can't access it and it --
17 number was changed before or after it was moved from
18 Cricket to Verizon?

19 A I didn't move it to Verizon, until after
20 June.

21 Q So, you became the primary account holder
22 with Cricket and then --

23 A No. Mike was primary account holder with
24 Cricket.

25 Q Okay. How did it go -- who authorized the

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 241

01 switch to Verizon?

02 A I was lucky that I knew the PIN Number and I
03 got it out of that account and started my own account.

04 Q Okay. So, you transferred it?

05 A Yes, I did.

06 Q Okay. So, then -- okay.

07 THE COURT REPORTER: Could we take a quick
08 break?

09 MR. POLLOCK: Yes, sure. Okay. We're going
10 to finish soon here.

11 (Thereupon, a short discussion was held off
12 record.)

13 (Deposition resumed.)

14 BY MR. POLLOCK:

15 Q Let's see. Have any of the witnesses that
16 you identified in your answers to our Interrogatories,
17 have you spoken with any of them about your claims in
18 this lawsuit?

19 A I have seen -- I have seen my neighbors in
20 passing by, when it comes to this lawsuit, when we did
21 mediation, there was a no contact order.

22 Q What did you do to prepare for your
23 Deposition today?

24 A I met with my Attorneys, several times since
25 they --

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 242

01 Q Did you review any documents?

02 A Yes.

03 Q What did you review?

04 A I don't know the names of the documents. I
05 have a great deal of difficulty understanding these.

06 Q In looking at your answers to our request for
07 information or your answers to Interrogatories and
08 Request Number 12 asked for you to identify all sources
09 of income and in response you identified only your
10 alimony that -- you said fluctuated from \$1,500 to
11 \$1,800 a month. Do you want to correct that?

12 A Yes.

13 Q Okay. What other sources of income did you
14 have besides your alimony during the same timeframe?

15 A I had this two Pilates classes.

16 Q Were there any other Pilates classes that you
17 taught or any other private instruction or classes that
18 you gave besides the ones at LA Fitness during the same
19 timeframe?

20 A No. We didn't have time -- I did not have
21 time to do that.

22 Q Okay. And if the Pilates class would start
23 at what, 09:30? The morning ones?

24 A 9:45.

25 Q 09:45, and you wouldn't get done until 10:45

01 and then you'd have to bike over, which would be what
02 about 11:00?

03 A 10:40, I'd be back. I was in the warehouse
04 by 11:00.

05 Q Okay. And for the two days a week, that you
06 were teaching the Pilates classes, that means that you
07 weren't getting to SeaWater until 11:00? Those two
08 days a week?

09 A It would be right there.

10 Q And so, when you would go home, what would
11 you do with your bike?

12 A A lot of times the bike stayed at the shop
13 until we had two electric bikes. Sometimes, there were
14 two electric bikes there. And then I would have to
15 take one home at another time.

16 Q Okay. So, for the days -- the two days a
17 week that you were teaching Pilates classes, which was
18 through, what, about COVID till about March of 2020?

19 A Um-hum.

20 Q That's a yes?

21 A Yes.

22 Q You wouldn't be getting into the office at
23 09:00 a.m. you'd be getting in the office close to
24 11:00, right?

25 A Yes.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 244

01 Q Okay. And so, for the two days a week that
02 you'd be getting in at 11:00 instead of 09:00, do you
03 agree that, you know, your claims still indicates that
04 you were working 91 hours a week?

05 A Yes.

06 Q Okay. And for your living arrangements where
07 Mike was paying half during the time relevant to this
08 lawsuit, it's your testimony that although Mike was
09 paying half of that, nearly all the time that you two
10 would spend together, outside of the office, was work
11 time, right?

12 A Quite a bit. Especially when, most of the
13 time that we were out in those, we had employees living
14 with us.

15 Q Okay. But --

16 A He didn't charge them to live with us.

17 Q Okay. Do you know if he was allowed to --
18 Mike was allowed to get a credit against whatever wages
19 were owed by providing them with room and board?

20 A Was he allowed to?

21 MR. CUTHBERTSON: Objection, calls for legal
22 conclusion.

23 BY MR. POLLOCK:

24 Q I'm just asking if you know that. Do you
25 know if he's allowed?

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 245

01 A I don't know if he's allowed. At the same
02 time, there was no reason to give my niece the master
03 bedroom in the house.

04 Q And --

05 A Hence, why he was going to pay for her rent.

06 Q And during the evening when you were home, on
07 social media, was there any part of that time that you
08 were on social media that was for your personal
09 consumption?

10 A Yes. Because I had to log in through my
11 personal account.

12 Q Okay. But logging in through your personal
13 account, did you then look at stuff because it was fun,
14 because it was recreational?

15 A Well, for the Facebook account, because it
16 hadn't been set up as a business account, yes. I went
17 through my personal account and I would see things that
18 came up.

19 A At the same time though, a lot of my stuff with
20 that has to deal with sailing and cruising --

21 Q You mean --

22 A -- and it was fun to see what -- how our
23 customers were utilizing the system when they were at
24 Anchor.

25 Q I mean, but you just have to do a search

01 for --

02 A That I did at times --

03 Q Excuse me. You would've to do a search for
04 SeaWater and any content that had that tag in it, it
05 would pop up, right?

06 A Yes.

07 Q And so --

08 A SeaWater Pro?

09 Q SeaWater Pro.

10 A Um-hum.

11 Q And so, that doesn't take a heck of a lot of
12 time?

13 A No. But I also only have 40 friends on my
14 social media.

15 Q I'm sorry?

16 A I only have 40 friends on my social media.
17 So, it's not like they post every day.

18 Q Correct. And so, when you're doing searches
19 and you're checking Google to see what registrations
20 are come up, I mean, that doesn't take that long
21 because you're looking, the searches pop up and there's
22 your answers?

23 A Not necessarily.

24 Q But I mean, when you're doing it daily, it
25 shouldn't take that long. You don't have that many

01 registrations that you're searching for daily.

02 A If you're going through a watermaker's
03 discussion group that's not listed on a Google search,
04 it takes quite a bit longer.

05 Q And how many of those groups are you looking
06 at a day?

07 A I was looking at quite a few every day. I
08 mean, just on selling that watermaker unit, you saw
09 that it was, what, four different sites.

10 Q You said it was one posting through Facebook
11 marketplace?

12 A That was for sale, but to go to each site to
13 see if there was a comment made about SeaWater Pro took
14 much longer. Because you can't do a search like that
15 unless there's something for sale.

16 Q Right.

17 A You have to go to each site to search it.

18 Q But when there's comments, they post to your
19 Facebook page. If there's questions or comments.

20 A It is through my Facebook page, but a lot of
21 times I didn't make my personal accounts. I didn't
22 make that. I -- it's a private account.

23 Q Right. But --

24 A And a lot of people, if I didn't want them to
25 have my personal information, I didn't give it out.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 248

01 So, I'd have to go each site independently.

02 Q Okay. So, we're talking about four sites.

03 A No, there's a lot more than four sites.

04 Q Okay. I mean --

05 A A lot more than four sites.

06 Q And so --

07 A And just checking the sail -- the sailing
08 YouTube channels and actually watching their videos,
09 some of those videos could be over 20 minutes long.

10 Q Some of them could be over an hour-and-a-half
11 long?

12 A Yes.

13 Q But a lot of them are put out because they're
14 kind of like documentaries?

15 A Yes. But in the process of making those
16 videos, they might be -- they might say something about
17 the business or they might have a plug for the
18 business.

19 Q And so, wouldn't they have that in a
20 description?

21 A No, not always.

22 Q But usually, right? If -- I mean, if they
23 know what they're doing, they're going to put a --
24 they're going to put it in the description where
25 they're going to put SeaWater Pro in there --

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 249

01 MR. CUTHBERTSON: Objection. Form.

02 BY MR. POLLOCK:

03 Q -- won't they?

04 A I can't answer for them, but no, that's not,
05 that was not always my experience.

06 Q It's not always, but it's customary as
07 somebody who's a professional YouTuber?

08 A True. But Colin with Parlay Revival, when
09 the COVID shutdown happened, he didn't put a tag in for
10 the watermaker, but yet when I went to the video, he
11 was talking about the unit for, I believe, six minutes
12 or so.

13 Q And when you were spending your time looking
14 through social media, you were doing it on your phone
15 or your computer?

16 A Always my phone.

17 Q Okay. Was Mike looking over your shoulder to
18 see what you were doing?

19 A I had -- he bought me the same phone. He
20 could see what I was doing at any time.

21 Q Well, I mean, he could, but he also didn't
22 necessarily know what you were doing on your phone at
23 any given time, when you're looking at it at night,
24 right?

25 A That could be very true.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 250

01 Q Okay. So, I mean, it could also be that he
02 had no idea whether you were consuming personal media
03 for yourself or you were doing market research for the
04 business, right?

05 MR. CUTHBERTSON: Objection, speculation.

06 MR. POLLOCK: Go ahead.

07 A That's true.

08 BY MR. POLLOCK:

09 Q Okay. I mean, it's not like you would give
10 him a report about what you were researching and what
11 you found on a nightly or daily basis, correct?

12 A That's true.

13 Q Okay. So, as far as Mike is concerned, there
14 was probably a lot of time that he had no idea that you
15 were looking on social media on your phone for what you
16 contend to be work related purposes, correct?

17 MR. CUTHBERTSON: Objection, speculation.

18 MR. POLLOCK: You can answer.

19 A It's about the same about it -- what his
20 employees are doing right now at the shop.

21 BY MR. POLLOCK:

22 Q It wasn't my question. My question was --

23 A I said it's possible.

24 Q So, it's possible. Mike had no idea what was
25 going on, what you were doing on your phone at night,

01 right? Because you didn't tell --

02 A For every minute, it is a -- for every minute
03 you're po -- it was possible.

04 Q Well, I mean, we're not just talking about
05 the minutes. We're talking about what you were doing
06 on a general basis. He -- how would he know?

07 A He knew every night that I was searching
08 social media to find things about the business and when
09 I came across a review or something like that, I would
10 send it to him.

11 When there was a negative comment made on the
12 watermaker discussion group, he actually would respond
13 to the group even doing it under my own personal name
14 because Mike was never -- he did not believe in social
15 media, even though he was -- wanted me to advertise on
16 it. He did not want -- or I'm sorry. He did not want
17 his own personal business on social media.

18 Q Mike had no idea how much time you were
19 spending on social media --

20 A Yes, he did.

21 Q -- for, excuse me, for work versus for your
22 personal use, right? He didn't know what the division
23 was. Did he?

24 A I can't answer to that.

25 Q Okay.

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 252

01 A He had the ability to look over my shoulder
02 and see what I was doing.

03 Q And you had your own social media accounts,
04 personal, that you were using to consume and post your
05 own personal social media in the evenings. Isn't that
06 true?

07 A I didn't post that very often, but yes.

08 Q Okay. And so -- for YouTube or TikTok or
09 Instagram, right, Twitter or X, Threads, whatever
10 social media outlet you want to talk about, Mike didn't
11 know when you were on any particular social media site
12 or what you were doing while you were on that site in
13 the evenings. Do you agree? He didn't know what you
14 were doing while you were doing it?

15 A I can't answer that. You would have to ask
16 him that.

17 Q I mean, he wasn't looking over your shoulder
18 and you weren't reporting to him?

19 MR. CUTHBERTSON: Objection to form.

20 BY MR. POLLOCK:

21 Q He wasn't looking at over your shoulder while
22 you were on social media at night. Was he?

23 A Not every minute, no.

24 Q Okay. He also wasn't -- you also weren't
25 reporting to Mike what you were doing while you were

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 253

01 doing it, when you were on social media at night. Were
02 you?

03 A No. I reported to Mike whenever I saw a
04 review or something going on that I thought had
05 questionable.

06 Q So, as far as Mike is concerned, if he didn't
07 hear anything from you about something questionable or
08 something relating to SeaWater Pro, he would have no
09 idea that you were looking online for something related
10 to SeaWater Pro. Do you agree?

11 MR. CUTHBERTSON: Objection, speculation.

12 A I don't know how often Mike was looking over
13 my shoulder.

14 BY MR. POLLOCK:

15 Q We'd have to ask Mike?

16 A It wasn't like -- yes. It wasn't like I hid
17 anything from him.

18 Q Okay. But I mean, if -- since you can't
19 speak for Mike --

20 A I can't.

21 Q -- it depends on what Mike's going to tell us
22 as far as what he knew and what he didn't know about
23 your -- what you were doing on social media. Do you
24 agree?

25 A He had -- he knew that I was on social media

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 254

01 looking out for the company at all times.

02 Q He had no idea on a nightly basis how much --

03 A How much of this was personal --

04 Q -- time you were spending?

05 A -- and how much was business.

06 Q He did not know that, correct?

07 A He may not have known it.

08 Q Okay. Was there any reason to believe -- do
09 you have any reason to believe that Mike knew how much
10 time you were spending on a nightly basis on the
11 business, on social media?

12 A He was right there next to me.

13 Q I mean, my wife's next to me on the couch,
14 but I have no idea what she's looking at half the time.
15 She's on her own phone, just like you were on yours.

16 A Yes.

17 Q Okay. So, we'd have to ask Mike if he knew
18 what you were doing while you're on social media,
19 right --

20 MR. CUTHBERTSON: Objection to form.

21 BY MR. POLLOCK:

22 Q -- at night?

23 A Mike knew that I was always looking out for
24 the business.

25 Q I understand that you're always looking out

01 for the business. My question is related to your
02 spending time on social media and what Mike knew about it.

03 A Mike would have to testify to what he
04 believed, but he knew I was watching this on social
05 media platforms.

06 Q So, he's going to testify that he knew you
07 were looking at social media at night.

08 A Um-hum.

09 Q I think Mike testified he had no idea how
10 much time you were looking on behalf of SeaWater versus
11 on behalf of yourself.

12 Would you have any reason to dispute that? But he
13 didn't know how much time you were spending for
14 yourself versus SeaWater at night on social media?

15 MR. CUTHBERTSON: Objection, speculation.

16 MR. POLLOCK: You can answer.

17 BY MR. POLLOCK:

18 Q Do you have any re -- do you have any reason
19 to dispute that?

20 A I know what I was doing, what Mike testifies
21 to, I don't know what he's going to do, but just the
22 fact that I don't have over 40 friends on a Facebook
23 should say that I wasn't doing a lot of personal stuff.

24 Q I mean, you could be a consum -- you could be
25 a -- view things on Instagram --

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 256

01 MR. CUTHBERTSON: Objection --

02 BY MR. POLLOCK:

03 Q -- doesn't mean you need a lot of friends,
04 right?

05 MR. CUTHBERTSON: -- objection, form.

06 BY MR. POLLOCK:

07 Q Correct?

08 A Yes. I was primarily on all the boating sites.

09 Q Okay. And you could be on Facebook looking
10 at all kinds of stuff, right?

11 A Yes, but I was not.

12 Q Okay. You could be on YouTube looking at all
13 kinds of different content, right?

14 A I was always sailing and cruising and
15 people -- you know, looking at cruisers that I thought
16 had a great presence.

17 Q And that's also your personal interest,
18 right, boating and cruising?

19 A Yes.

20 Q And that's why you have the Salty Blue Fun
21 business?

22 A Yes.

23 Q And why you got your Captain's License?

24 A Yes.

25 Q Okay. So, there's a blur between what's

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 257

01 personal and what's work, right, when you're looking at
02 social media?

03 A Sometimes --

04 MR. CUTHBERTSON: Objection, calls for legal
05 conclusion.

06 MR. POLLOCK: Go ahead.

07 A I -- like I said, there's no sin in enjoying
08 your work.

09 BY MR. POLLOCK:

10 Q Okay. And then the question is just, where
11 do you draw the line between what's personal
12 consumption and what's work consumption, right?

13 A That's true.

14 MR. POLLOCK: Okay. I don't have anything
15 else. Dillon you have any questions or you want
16 to just read or waive? You can read your
17 deposition for its accuracy or you can waive a
18 reading.

19 MR. CUTHBERTSON: We'll waive -- we'll waive it.

20 THE COURT REPORTER: You waive?

21 MR. POLLOCK: Waive.

22 (Deposition concluded at 05:12 p.m.)

23 (Reading and signing of the
24 deposition by the witness has been
25 waived.)

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 258

CERTIFICATE OF REPORTER

STATE OF FLORIDA

COUNTY OF BROWARD

I, GINA PETRILLO, Court Reporter and Notary Public for the State of Florida, do hereby certify that I was authorized to and did digitally report and transcribe the foregoing proceedings, and that the transcript is a true and complete record of my notes.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Witness my hand this 20th day of May, 2025.



GINA PETRILLO, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

Page 259

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF BROWARD

I, GINA PETRILLO, the undersigned authority,
certify that MELINDA MICHAELS, personally appeared
before me and was duly sworn on the 21st day of
January, 2025.

Witness my hand this 20th day of May, 2025.



GINA PETRILLO, CER, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA
Commission No.: HH 87639
Commission Exp.: 02/01/2029

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

\$	85:2,11,15,16 160:22 211:13,22 213:16 214:3	0.43 169:13,16,19 170:1,4,10	173:25 174:9,14 175:6 177:9 180:14,24 181:4, 10,13,18,24 182:25 183:1,15, 17 187:21,23 188:4 192:1
\$1,000 226:15	\$3,052.99 226:19	0.7 169:25	07:01 183:2
\$1,100 87:11,15 88:1 218:2	\$3,300 78:3,5,6	0.71 171:12,18	07:30 62:15
\$1,500 242:10	\$384 106:9	0.86 169:25 170:21 171:6,11,13	08/29 146:8
\$1,800 242:11	\$4,300 78:1	01:00 130:23	08/31 146:6,8
\$1.4 55:24 178:2	\$4,400 78:1	02:00 56:6 97:17 98:3,5, 6 114:19,20 115:3 116:15 155:24 176:15 203:18	0840 21:20 22:15 23:3 74:14 129:11,13 238:7
\$10,000 140:17	\$5,000 77:23	0303 223:23	08:00 56:5,21 57:11 58:2,17 60:7,12,22 62:15 97:17 98:3, 5,6 114:19,20 115:3 116:15 117:19 118:8 155:24 174:14 175:7 203:18
\$100 226:15	\$600 84:6 207:4 218:2	04:00 127:4	09:00 56:3,16 57:1,10 58:1,14,23 59:6,10 60:6,11,21 62:6 64:3,6 126:17,25 127:3,17 128:16 129:15 130:22 173:24 174:8,14, 17 175:6,16 176:4 177:9 180:1,23 181:10 182:12,15 187:5,21,23 188:4 189:2,21 192:1 243:23 244:2
\$100,000 38:11 58:20 127:12	\$81,583.41 168:6 172:15	04:30 44:9 118:1,5	
\$11,000 69:2	\$850 78:9	05:00 131:24 174:17 175:17 187:5 189:4	
\$150 69:16	\$880 78:9	05:12 257:22	
\$168 69:17	\$90,000 170:12 192:23	06:00 56:4,16,18,20 57:1,11 58:2,14,24 59:7,10 62:7 64:3, 6 126:17,25 127:17 128:16 129:15 173:25 174:9 189:4	
\$2,000 225:13	\$92,911.35 168:14 172:14	07:00 60:6,21 126:17,25 127:17 128:17 129:16 157:25	
\$21,363.27 221:20	\$93,000 156:4		
\$21,886.02 169:10	0		
\$21,889.60 221:16	0.14 170:1 171:18		
\$22,000 220:9	0.29 170:1		
\$3,000 69:12 84:19,21,23	0.429 171:19		

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

09:30 242:23 09:45 44:2,8,16 45:19 118:2,4,5 242:25 0:24-cv-60984-rosenberg/augustin-birch 5:6 <hr/> <p style="text-align: center;">1</p> <hr/> 1 17:15 34:7 153:15 215:2 1,200 40:2,17 47:23 48:3 68:10 180:14,25 181:5,11,22 182:14,23 186:22,23 1,300 179:21,23 1,350 166:8 1,500 212:14 1,800 212:12 1,875 166:9 1.4 178:6 10 93:14 178:6 180:2 207:10,22 215:25 230:24 232:25 234:1,4 100-ton 11:18 12:10,19	13:13 14:10,13 15:4,15 101 86:16,17,25 102 135:3,4 136:21 103 137:25 138:3 104 146:18,20,24 105 150:21,23 106 152:19,20 107 153:4,6,10,15 168:9,25 171:24 108 161:11,17,18 171:25 109 172:24,25 10:00 176:16 10:05 5:7 10:40 243:3 10:45 242:25 10th 112:13 223:2 11 130:21 175:7 208:8,17 209:2,4 110 204:11,12 111	214:19,21 112 217:3,4 113 220:19,21 114 223:14,15 115 224:10,11 11:00 34:7 243:2,4,7,24 244:2 11th 222:21,22 12 162:3 179:20,23 198:24 199:5 242:8 13 82:1 154:11 1314 17:14 135 41:13 138 107:3,23 13th 149:12 14 211:4 14th 135:22 136:2,5 137:13 138:12 141:7,23 144:17 148:7 15 211:4 234:5 236:11	154 106:24 107:3,23 1559 86:25 16 211:4 219:11 1602 150:22 1606 150:22 16th 168:24 169:4 170:3 17 122:10 17th 42:4 43:1,11 239:24 183 106:24 19 37:18 232:22 234:14 235:4 1968 21:19 22:5,6,25 23:2 1969 8:9 1st 17:14 87:15 207:3 <hr/> <p style="text-align: center;">2</p> <hr/> 2 39:22 52:13,15,16 146:24 153:20 176:9 215:17 20 37:10 52:12 190:4 192:2 195:21
--	--	--	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

208:9 236:11 248:9	25 44:24,25 45:5, 7,13,16 49:25 50:1 52:1,21 58:23 59:23,25 60:5,6, 11,20 61:11,19,22 62:6 65:9 74:2 79:10 82:23,25 85:13 92:10,21 93:20 117:24 118:7 120:13,15, 24 121:1 128:10 177:14,16 226:15 243:18	18,19 145:18 148:7 159:18	24 19:14,23 24:6 222:22
2000 13:3,8 37:10,12 39:22 47:24 51:19 92:7 155:15		2024 12:14 17:10 19:18 48:8 111:14 112:9, 13,16,22 142:17 152:8,15 219:21 220:7 222:4	24th 135:15
2004 13:8		2025 5:2,7	25 19:16 46:4 49:8 143:6 194:5 201:10,11
2015 24:5 48:25 49:3 165:12 219:1		20th 138:12	251 217:3,8
2016 165:12 219:2	2021 29:5 32:21 34:11 51:20 52:15 84:8 87:5 94:17,18,23 95:3,5,12 112:21 121:2 126:13 127:15,17 128:2, 10 163:7,13,20 225:24	21 5:2 29:7,18 35:7 37:13,15 50:3,4 52:4,6,12,17 53:7, 25 57:13 177:2 225:14 226:1,11, 12	255 217:8
2017 25:25 68:24 218:18,20,24,25 219:4,5,9		212 9:25 10:12	256 217:3,8
2018 39:13 47:9,15 68:23 118:13 198:5,8,11 199:19 218:17 225:1	2022 14:1,2,17 16:2 20:20,22 22:2 24:6 26:1 43:4,13 44:17 52:14,17 53:10 55:16 74:1 76:13 85:10,13 91:14 94:11,12,14,20 97:1,6 99:5 100:22 104:12 114:11 116:6,21 118:16, 17 120:7 177:1,3 207:3 208:10,18 209:7 237:9 240:1, 14	216th 210:21	26th 163:7 237:9 240:1, 13
2019 23:11 24:9 32:4,12 37:9,19 39:14 42:21,24 43:4,13, 15 44:14,17 45:20 68:7,9,22,23 69:21,23 70:1,3,5, 6 78:23,25 79:1, 10,11,12 82:20 83:7 84:4,5 108:6 118:12 120:21,22 126:14 133:10 155:15,18 167:13 168:24 170:3 198:12,13 207:3 218:5 227:2 237:9 240:1,13		217th 210:21	27th 145:22 155:23
2020 37:13,14,22,23 38:1 39:16,21,23,	2023 12:13,17 13:25 14:7 15:14 22:6,22 90:4 103:21,22 134:17 135:1,15, 22 136:2,8,23 137:13 138:12 141:23 144:5,17,	21st 5:7	28 170:4 198:4
		22 14:3,11,14 21:1,5 22:11,18 42:21,24 43:15 47:5,12 53:11 90:6 96:9 102:19 116:14 177:2 227:2	28-1 163:4 168:4
		23 14:9,15 19:15 24:6 48:9,10 90:5 149:12 154:24 160:15,17	28.43 168:25 169:7,10
		230 224:10	2836 5:11
			28th 136:8
			2911 87:4
			29th 145:16,20
			2nd 28:9 29:3 39:9 87:16

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

3	4	602	168:14
3 204:24	4 9:9,16	106:17,19	913 710-0840 16:4 27:11
3,000 160:25 212:16	4,100 9:23	7	954 106:19
3,300 203:1	40 169:14,20 246:13, 16 255:22	7 131:22,23 153:9 176:5 183:14	954 250-4620 16:20
30 189:22,23 190:3	401K 165:18	7,000 40:3,17 179:10,14	954 838-1968 15:23
300 107:9	41 163:2	75 103:3	980 202:25
303 223:13	45 233:12 235:18	7th 112:15,22	9:45 242:24
30th 237:9 240:1,14	46 239:21	8	9th 17:10 87:5 219:21 220:7
31st 145:18 168:24 170:3 207:3	4620 17:4	8 117:20,22 131:22, 23 180:2	@
3233 28:9 29:2 36:12 39:9	4me@gmail 23:19	80 192:23	@gmail 23:17
33 78:4	4th 132:5,6 222:4	8th 8:9 87:5 112:21	A
330 202:25	5	9	A-F-A 13:9
33301 9:10	50 73:23 103:2,3 198:24 210:11,12	9 207:1	A-R-Y-A 206:11
365 170:23 171:1	52 171:1 209:14	90% 169:17,19 170:5	a.m. 5:7 56:16 57:10 58:1,14,24 59:6 60:21 62:6 64:3 98:3,5,6 114:20 115:3 116:15 126:25 128:16 129:15 155:24 173:24 174:8 175:6 176:4,15 180:1,23 182:12 187:21 189:21 203:18 243:23
37 9:9 103:2 155:23	6	90s 16:13	
395 171:1	6 131:23 206:14 215:1	91 108:6,8 109:7 130:10 154:5,9,11, 13,23 155:4,7 163:1,6 192:12,15, 18 199:23 244:4	
3rd 152:8,15	60 38:12	91,900	

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>A4 9:25 10:12</p> <p>AAERT 5:10</p> <p>abided 142:22</p> <p>ability 8:15 47:17 103:10 125:21 201:13,14, 16 252:1</p> <p>ablation 41:10</p> <p>able 16:25 23:7 103:4 117:15 135:18 194:18</p> <p>about 14:1,16,19 15:17 16:3 18:11,19,20 19:5,7,9,10,21 20:11 21:9 23:3,7 33:19 37:17 38:5 43:12 45:9 46:20 48:6 49:18 50:17 51:25 56:1,4 58:14,22,24 59:15 64:10 65:4 67:2 69:9 71:7,10 73:21 74:21,22 76:22 77:11,24 78:2,16, 17,18 79:16 83:25 84:19 85:21 92:5, 24 95:13,22,24 96:11,21 99:9 102:4,9,22 103:25 104:10,25 107:23 112:1,23 113:23 116:3,6,7,13 121:18 127:15,17 129:5,24 130:25 139:4 140:9,19 141:21 143:23 144:16 145:9</p>	<p>149:17,20,23,24, 25 153:22 154:11 155:9 164:4 165:1 173:21,24 174:9, 14 176:2,13,24 177:8 178:8 187:13,20 189:16 191:9 195:18 198:7 199:6,7,8,22 202:19 204:3,25 205:9 207:21 208:1 209:15 210:20 211:12 212:13 213:10 216:3,12 218:3 223:10 226:12 228:16 231:22 232:16,22 233:8 235:8 238:1 241:17 243:2,18 247:13 248:2,16 249:11 250:10,19 251:4,5,8 252:10 253:7,22 255:2</p> <p>above 217:22</p> <p>absolutely 17:18 24:11 31:15 40:12 54:14,25 56:24 64:1 115:21 140:5 143:6 197:5, 10 206:20 227:13</p> <p>accept 85:25 214:2 216:14</p> <p>accepted 100:1,2</p> <p>access 63:11 91:19 99:18 101:22 106:25 107:22,25 119:24 134:4 221:9 237:18 238:20 239:9,13,18 240:6,</p>	<p>16</p> <p>accidental 41:12</p> <p>accommodate 6:16 40:18</p> <p>accompany 72:12 227:11</p> <p>accompanying 229:1</p> <p>according 163:4 219:20</p> <p>account 18:9 23:8 63:3 68:3 69:25 70:1,4, 5 83:23 84:1 85:18 87:4,9 88:14,20 89:2,4,14,15,17 91:20,22 99:5,18, 23 100:2,4 101:2,5 105:19 147:24 148:4,18,21 149:1, 14 165:15,16 201:25 202:4,5 211:15 219:19 221:10,12 222:5 225:14 226:7,23 237:24 238:1,15, 17,20 240:21,23 241:3 245:11,13, 15,16,17 247:22</p> <p>accounted 203:22</p> <p>accounting 33:11,12 117:12</p> <p>accounts 35:2 87:15 218:8, 11 247:21 252:3</p> <p>accuracy 257:17</p> <p>accurate 161:25 204:18</p>	<p>accused 140:2</p> <p>acknowledged 208:23</p> <p>across 71:25 72:20,21 73:9,11 117:3 187:10 251:9</p> <p>Acted 110:12 155:5</p> <p>active 17:20 20:10 101:17</p> <p>actively 20:12 21:19</p> <p>activities 23:23 35:10 57:4</p> <p>activity 128:15 129:14 130:2</p> <p>Acts 110:13</p> <p>actually 12:12 23:5 30:15, 16,20 33:22 44:10 50:18 56:7 59:3,4 63:3,10 66:18,19 67:20 81:8,9 131:20 132:3 135:24 140:8 143:15 149:21 150:14 154:10,14, 16 167:17 172:10 180:16 192:9 215:4 220:10 227:4 229:5,21 234:18 248:8 251:12</p> <p>adapter 33:23</p>
--	--	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>adapters 66:3 234:20</p> <p>add 150:8,16 171:3 202:8 215:7,10,12</p> <p>added 202:12</p> <p>addition 69:20 82:10 89:14</p> <p>additional 70:12</p> <p>address 9:8 25:21,24 26:3 27:9 29:3 36:19 107:7</p> <p>addressed 84:11 90:11</p> <p>addresses 23:12 25:6,9 37:4</p> <p>admission 109:12</p> <p>admitted 108:22,25 109:6 110:10 130:11</p> <p>adoption 206:21 215:15</p> <p>advertise 251:15</p> <p>aerobic 12:3</p> <p>Aerobics 13:10</p> <p>AFAA 13:7,9</p> <p>affect 8:15</p> <p>affirm 5:12</p>	<p>afford 208:5</p> <p>afraid 118:18,21 149:16</p> <p>Africat 73:24</p> <p>after 5:22 41:5 43:1 46:22 56:20 59:11, 13,14 61:22 63:3 64:6 75:4 76:5,12 85:3,5,8,10,12 92:8 93:23 94:2 100:12,21 102:19 103:21,22 120:10, 11 129:9 130:16 131:8,9 138:11 139:21 140:17 142:4 143:24 148:2,5,6,10,20 149:11 155:23 157:9,25 167:8 174:6 177:17 178:17 181:22 182:13,24,25 183:1 188:5,17 189:4,6,7 190:19 198:8,11,14 199:25 202:23 210:8 211:4 219:18 227:5 232:6 238:5 240:17,19</p> <p>afternoon 133:3 228:8</p> <p>afterwards 120:2,5 155:22</p> <p>again 52:4 67:19 75:19 107:1 114:17 123:9 137:18 187:11 189:25 202:16 218:21</p>	<p>against 6:4 112:5 134:16 135:18 136:2 138:21 164:25 211:5 219:20,24 220:4,20 244:18</p> <p>age 208:3</p> <p>agency 110:16 219:7</p> <p>ago 100:10</p> <p>agree 53:3 110:22 111:5 120:1 147:15 163:22 168:17 191:18,19 207:4 231:11,12 239:14 244:3 252:13 253:10,24</p> <p>agreed 109:10 171:19 190:17</p> <p>agreement 29:25 30:13 200:9, 10 212:3,18</p> <p>ahead 6:16 7:1,11 97:5 111:24 118:19 119:3 123:2,10 124:16 125:13 149:5 214:17 250:6 257:6</p> <p>AI 5:12</p> <p>aid 143:25</p> <p>aides 13:16,17,18</p> <p>air 193:20 194:3</p>	<p>airfare 82:12</p> <p>airline 83:19</p> <p>AJ 213:5</p> <p>alcohol 31:20</p> <p>alimony 212:9,11,12 242:10,14</p> <p>all 6:20 7:2,13 14:2,5 15:18 18:1,17 23:6 25:16 31:11 34:18 35:2,23 37:23 39:8,19 40:23,24 42:20 44:17 48:5 54:17 55:19 60:4, 15 64:25 68:15 69:24 70:2 71:7, 11,16,19 72:14,24 74:9,11 78:16 81:12 82:12 84:13 85:20 86:2 94:10 95:14 99:18 100:3 112:18 115:6,11 134:5 156:7,15 159:9 166:12,14 167:12,19 173:19 175:18 178:4 181:2,3 183:23 186:13 189:16 193:1,4 201:20 203:23 207:20 215:4,20 216:1 228:6 231:10 236:6 237:1,20,25 242:8 244:9 254:1 256:8,10,12</p> <p>allegations 114:1</p>
--	--	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

alleged 205:1	81:18 82:11 83:23 85:1,19 89:15 92:23 93:2 95:18 97:23,24,25 98:23 102:17 104:21 117:12 119:6,19, 21 120:8,9 122:16 129:3 132:11 136:13 145:7 150:2 168:1 183:7 187:2 189:9 196:9 198:18 206:20 215:9,14 224:21 225:3,6 246:13 249:21 250:1 252:24 256:17	American 12:23 13:10	207:10,22 208:17 209:4 210:15 214:25 215:8 230:13 238:25 249:4 250:18 251:24 252:15 255:16
allegedly 208:15		amount 69:11 212:11 226:22	
allotted 122:12		ampersand 24:19	answer's 208:8
allow 12:7 102:25 116:4, 22		anchor 13:20 80:9 195:17 245:24	answered 6:19 105:7 171:15 182:6
allowed 31:3 34:6 42:25 110:1 117:17 139:1 148:24 150:3,6 244:17,18, 20,25 245:1		and/or 102:4	answering 57:6 74:7 105:9 174:19
allows 12:8 113:2	although 123:6 160:25 244:8	Annapolis 120:9	answers 9:6 206:2 211:16 214:14,18 241:16 242:6,7 246:22
almost 169:17 209:9	always 13:15 26:7,9,13,15 28:17 32:4 63:8,13 64:8 74:11 90:10 116:25 125:19 130:22,24 184:18 227:21 229:20 248:21 249:5,6,16 254:23,25 256:14	annoyed 7:8	any 7:19 8:14,15 10:21 11:7,15 13:11,19 14:18 16:14 17:16 20:14,19 21:6 22:25 24:8 25:1,6 46:12 48:15 49:14, 16 50:15,23 54:19 55:1 60:2 63:24 65:2,7,11 66:24 69:6 83:7 84:14 85:12,17 88:4,19, 23 89:2 90:19,21 91:2 95:21,22 97:24 98:19 99:18 101:20 107:6,10 108:22 110:7 111:12 115:5 116:20 118:8 124:19 133:25 137:14,15 138:12, 15 141:4 142:10, 15,24,25 148:3,9, 19 149:12 156:11 160:5,13 162:11
alone 73:15 97:22 103:2, 4,7 104:18 195:20		annoying 63:17	
along 11:22 12:25 41:12, 25 65:7 80:4		another 7:6 16:16,17 32:19 42:12 61:3 68:24 87:15 93:7 126:21 132:23,25 155:11 168:1 178:6 188:5 189:22,23 190:3 192:2 194:20 213:4 214:3 225:22,25 226:13 227:20 243:15	
already 87:14 105:12 177:3,25 190:22	am 14:11 21:14 30:20 49:15 78:10 134:15 147:10 200:1,6 201:12 209:17 213:24 218:17	answer 6:7,9,13,24,25 7:2, 11 63:15 74:9 97:5 104:15 107:8 124:15 125:3,5,15 141:24,25 148:14 149:5 152:25 164:2 170:21 173:4 178:12 204:24 206:14,25	
also 11:21,22 12:2,24 14:25 15:7 22:22, 23 25:12 27:12 31:19 33:6 35:2, 10,12 40:21 42:7, 10 47:10 48:13 50:13,14 53:17 56:11 57:14,15 60:19,22 61:24 66:2,4,8,9,13,16 67:9 69:5 70:9 74:16,20 78:20	Ambien 134:3,7,11,12		
	amended 161:21 168:19 171:25 172:10,17, 18 206:2,7 214:16, 20 215:2,8,9 239:21		

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

163:12,22 164:23, 24 165:22 167:19 193:6 194:9 198:8 200:3 201:15 202:17 209:1 212:4,19 218:3 223:2,25 224:1 241:15,17 242:1, 16,17 245:7 246:4 249:20,23 252:11 254:8,9 255:12,18 257:15	91:16 224:3 225:10,11 231:1 apartments 70:20 78:17 166:11 202:19 225:8 app 90:25 119:20 appear 64:11,21 65:7 apple 214:17 applied 12:19 114:2 136:22 appointment 121:23 227:3,4 appointments 122:4 226:24 227:1,12 228:15 229:24 appreciate 26:23 27:3 approach 56:11 91:7 approached 21:12 65:16,17 approval 202:1 approve 206:19 approved 201:22 approximates 181:2 approximation 181:19,20 182:21 April 19:3,22 52:14,17	87:5,15 94:11 135:1,22 136:2,3,4 137:13 138:12 141:7,23 144:17 148:7 149:12 219:21 220:7 222:19,21,22 226:15 aquatic 12:20 aquatics 11:20 AR 66:8 area 28:10,19 29:7 40:21 56:8 arguing 80:13 argument 137:4 arguments 53:16 Arizona 11:13,14 160:23, 25 219:2,3 arm 72:1 around 13:8 56:3 57:1 67:17 69:15 73:24 78:9 79:7,18 82:19 116:2 127:3 152:17 174:23 179:20 181:10,18 182:12,20 184:16 191:22 196:6 233:16 arrange 57:18	arrangement 46:2 arrangements 187:8 202:10 244:6 arrest 139:22 140:2,4 196:1 arrested 139:7,23,24 140:11,22 arrived 46:23 47:1 132:21 arthritis 12:25 Arya 136:23 137:8 205:9 206:10 ask 6:4,6,18 8:10,11 63:21 97:4 111:15, 25 119:16 122:20 138:8,14 143:1,5 151:19 157:14 164:9 173:19 178:11 183:21 189:10 192:10 206:15 214:4 216:22 239:12 252:15 253:15 254:17 asked 45:23 72:6 79:19 90:16 92:15 105:6 108:2,12 115:8,20 117:10 139:18,21 140:2,4 141:6 148:15 167:21 171:14 183:5,12 197:25 210:11 212:21,23 215:20 216:19,20 237:7
--	---	--	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

239:17 240:1,5 242:8 asking 56:1 79:16 117:1 123:7 164:4,9 169:22 181:3 187:24 189:15 200:15 210:14 239:3 244:24 asks 230:4 assaulted 139:12 assem 34:21 assemble 199:13 assemblies 34:22 38:17 94:15, 21 180:18 Assembly 198:20 assigned 25:3 assignment 183:22 Association 12:23,24 13:10 assume 170:23 171:8 172:12 assumed 149:16 220:11 assuming 173:10 astronomical 35:3 ate 120:14,16	attached 159:4 220:25 222:23 attended 32:7 227:1,5 attorney 101:21 108:2,3 170:20 206:17 213:23 Attorneys 241:24 August 22:6,22 144:5 145:16,18,20,22 225:14,24 226:11, 12 Australia 57:20 182:4 Australian 57:16 authorize 91:19 authorized 240:25 automated 127:14 automatic 100:6,7,14 automatically 152:13 automation 185:4 Automotive 17:14 available 108:8 115:12,14 126:4 175:2 186:11 188:9 194:23 226:9 228:1,2,4,5 230:4	Ave 92:7 Aventura 42:9 Avenue 10:2,3 17:15 28:10 29:3 39:9 average 153:25 180:11,19, 24 182:12,22 183:13 187:17,19, 21,25 188:3,18 189:19 averages 188:23 awarded 136:19 220:12 aware 26:6,8 69:5 165:2 184:20,21 218:10 220:3 away 125:20 137:10 160:2,6 199:2 211:19 232:12 <hr/> B <hr/> B-A-I-L-E-Y 29:11 B-A-L-D-O-T-T-A 66:22 B-L 66:22 back 6:10 7:5 31:3 32:5, 8,9 38:7 39:3 45:14 53:6 67:16 68:6 77:7,15 83:17,20 86:4,10 88:23 95:19 97:16	105:25 112:17 113:2 114:4,24 119:7 122:5 128:23 132:20 133:20,21 137:15, 21 138:11 141:4,9 146:17 148:2 155:17 160:23,24 161:10 165:12 172:6 179:16 194:4 195:20 203:16 207:12,25 223:7 229:8,16 231:10 233:10,20, 23,25 235:19,25 240:11 243:3 background 50:15 98:14 bad 33:16 41:8 104:12 105:11 227:7 Bahamas 53:23 83:9,21 223:11 Bailey 29:8,10,11,15,21, 23,24,25 30:4,6, 14,15,18,22,25 31:1,9,10,14,17,21 33:6 34:4 37:17,25 39:1 50:23 51:11, 15,22,25 52:16,19, 20,24 53:10,16,24 54:8,13,16,20,22 93:6,18 95:6,8,19 97:24 114:23,24 115:25 119:7 128:3,8 136:23 137:7 143:25 203:16 205:3,7,12 213:5 215:17 225:5 Bailey's 29:14 53:13
---	--	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

225:10	35:3 80:19 240:21	210:18 211:17	192:4,6,14 204:15
Baker	because	213:23 219:5	209:8 211:5
110:12,13 155:5	6:11 7:7,9 16:17,	221:19 222:3,20	213:16 221:3,4
balance	24 19:25 20:22	224:6 225:16,25	222:6 230:22
221:13,16,19	28:11 30:16,23,25	226:8 227:25	234:9,20 240:17
222:1,17	32:9,12 35:22	228:22,23 229:3,5,	
Baldotta	45:9,19,25 48:20	10,12,22 231:19	beforehand
66:17,21 97:18	52:7 55:9 56:19,21	233:16 234:12,19,	77:25
bank	58:19 59:15,18	21 235:20 239:2	beginning
70:4,5 83:23 84:1	60:2 61:2 63:15	245:10,13,14,15	19:15 29:5 34:16
85:18 87:3,15	64:13 65:16 67:16	246:21 247:14	57:12 94:13 187:4
91:20,22 218:8,11	68:9 69:16 81:2	248:13 251:1,14	217:20
220:20 225:14	83:17 84:10 85:25	become	behalf
Bar	88:17 90:24 93:15	21:4 126:7 175:15	99:6,19 142:6
231:24	94:7 98:13 99:15,	bedroom	170:11 202:13
bare	24 101:14 103:13	245:3	209:3 255:10,11
195:3	104:1 105:24	bef	behind
base	106:14,18 107:15	10:7 62:24	76:4
113:22	113:16,17,19	before	Bel
based	115:19 116:9,23	7:11 8:2,4 9:24	193:20
155:24 173:20	117:10 118:21	16:3 38:7 39:5	believe
221:20 231:15	121:5,11,20	41:2,4 44:14 45:20	9:13 12:13 13:3
basically	122:22 123:20	48:17 58:18,22	14:15 15:14 17:11
20:2 125:1 155:25	124:3,23 125:7	59:24 61:18 64:4	19:3,13,19 22:6
188:23 191:21	126:6 127:12,24	68:7,11 70:17	23:10 24:25 32:3
231:17	128:15 129:16,19	76:15 77:16 78:2	39:21,23 45:9
basis	130:6 131:1	80:15 83:15 88:6	51:19,21 52:18
250:11 251:6	133:18 139:8	91:15 92:21	53:12,15 67:21
254:2,10	140:12 141:16	100:21 107:15	68:8,23 69:12,16
bathroom	145:6 146:8,11	108:23 111:13,18	70:1 71:1,3 73:17
161:4	147:5,7 149:15	112:18 113:4,9	77:12 79:5 81:8
Bay	154:5 155:4	117:19 118:1,7	83:6 87:7,23 88:25
17:14,15	156:15 157:10,11	120:22 126:11	92:7 93:6 100:11
beach	158:2,8 162:15	127:8,9 137:3	105:20,21,23
9:25 15:3 203:14	172:6 176:1,16	138:12 141:6,7,23	112:12 131:24
204:4	177:2,9 178:15	145:12,19,24	133:6 134:21,22
bears	180:21 181:7,24	146:8 152:23	144:6 153:2,18
86:25	182:5 184:13,19	153:13 159:13	156:18 159:18
became	185:17 186:7	161:22 163:11,24	162:1,14 203:2
	187:9,12 188:18	164:15 167:2	204:19,20 215:22
	189:7 190:21,25	168:1 173:3	218:25 219:11
	194:20 195:8,19	177:15 182:24	222:2 224:15
	196:1 197:7 202:7	186:17 190:8,14,	225:15 227:3
	204:7 206:23	20 191:5,10,12	234:21 249:11
	207:15 208:13		

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

251:14 254:8,9 believed 209:21 255:4 below 41:13 benefits 54:6 besides 11:14 13:11 48:5 50:22,23 78:17 83:22 87:13 89:1 104:9 110:4 126:9 164:20 208:25 209:7 214:14 218:2 226:24 242:14,18 best 181:20 bet 74:19 between 30:18 42:21,23 43:3,14 62:14 64:3,5 70:19 74:22 81:9 103:3 167:12 168:18,24 171:23 172:1 217:13 227:1 230:8 231:14 256:25 257:11 beyond 162:22 202:16 big 73:20 121:10 201:15,17 bigger 39:25 180:15 203:4 bike 44:2 45:10 47:20, 22 48:2 133:14	230:25 231:5,10 243:1,11,12 bikes 48:13 243:13,14 biking 231:8,10 bill 222:1 240:4 birth 8:8 birthday 82:21 bit 25:13 30:3 56:25 66:15 106:15,16 121:8 176:24 180:15,23 194:3 228:6,21 244:12 247:4 bite 62:16 214:17 blowing 32:10 blowers 199:16,17 Blue 10:18 20:5 24:12, 16 48:7 197:11 256:20 blur 256:25 board 19:8 244:19 boat 9:22 24:6 41:16,20 48:12 51:4 52:2 57:3 69:21 70:7,15 71:24 72:4,12,13, 19 73:8,17,20 75:5,10,22,24	76:11,18,22 78:7 79:2,20 80:5,21 81:7,8,13 82:11 108:18 151:5,7,8 152:3 154:20 155:10,21 165:7 166:18,19,20,21, 25 167:1,6,14 183:25 195:16,20 196:4,8 197:14,17 198:15 200:17,19 203:6 208:5 224:15,16 231:22 232:2,8,12,15 233:6,9 234:11 235:5 boater's 81:24,25 82:6 boating 152:2 256:8,18 boats 71:22 90:20 201:21 Body 15:3 bonanza 191:21 bone 195:3 bookkeeper 26:7,8,12,16 28:23 64:24 92:1,3 94:5 157:14 books 55:25 boot 76:4 border 187:10 boss 196:25	both 7:8 21:22 51:5 70:20 75:12 76:16 78:7 88:14 124:24 128:14 145:18 158:22 bothered 34:8 38:24 130:24 bottom 26:4,5 87:1 144:25 145:1,17 146:4 bought 41:14,20 57:21 86:12 226:3 249:19 box 199:13 boxes 29:16,19,21 44:7 72:3 94:8,9,14,20 95:1 103:1,3 123:11,20,24 128:19,21 157:7, 15 229:8 brag 219:15 brain 65:20 brand 54:7 break 6:15 32:6,8 46:13 111:22 134:5,10 161:5 241:8 Brian 5:18 6:1 brief 19:8,10 bring 118:22 119:7 174:21
---	---	--	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>Briny 9:25 10:2,3,12 70:16 74:23,24 75:19 76:5,6,8,17, 21 77:1,4,8,18,22 91:15 143:13 166:19</p> <p>broke 72:1,2 157:12</p> <p>broken 22:8 157:6 158:4</p> <p>brought 6:4 55:10 138:21 199:20</p> <p>Broward 135:10</p> <p>bucks 166:6</p> <p>build 38:12 209:25</p> <p>building 34:21,22 38:19 50:17</p> <p>built 36:3 50:13</p> <p>bunch 59:18 107:7,20 229:4</p> <p>bus 42:10</p> <p>business 16:18 17:3,5,12,16 18:13,20 20:5,6 21:13 25:25 26:23 27:1 29:10 31:2,24 34:3,16,18 38:5 39:9 40:14,23 41:15 43:2,12 48:15 50:7,9,19 55:24 57:14 58:8 61:23 62:1 65:17</p>	<p>67:3 69:23 70:2 71:11,13,16 72:9, 16,22 73:2,7 78:22,23,24 82:16 85:5 88:12,20 90:14,17,24,25 91:4,5,6,8 96:1,2, 5,22 97:8 99:25 102:18 103:1,4,7 104:1,18 105:11, 14 127:13 130:18 143:2,3,5,9 149:22 156:12 158:18,21 164:25 168:1 175:13,22 177:18 178:23 179:3 183:3 185:4 189:8 191:22 194:19 196:12,20 208:5 209:24 210:5,7 218:13 220:1 226:9 230:10 231:15 238:6 239:2 245:16 248:17,18 250:4 251:8,17 254:5,11, 24 255:1 256:21</p> <p>busy 94:7,9,25 130:6 177:10,13 178:15</p> <p>butt 146:17</p> <p>buy 48:21 57:22 90:21 201:13,19,24</p> <p>buyers 143:15</p> <p>buying 66:1,16 90:19 200:16 201:20 204:6</p> <p>buzzer 141:24</p>	<p>bypassing 33:11</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p>calculate 93:12 170:24</p> <p>calculated 162:14 168:22</p> <p>calculating 93:21,23,24</p> <p>calculation 153:22 168:10 171:12</p> <p>calculations 171:20</p> <p>call 97:19,20 101:19 119:17,18 123:18, 21 124:1 129:23 139:15,18,20 158:2 185:23 188:7 205:20 229:20</p> <p>called 5:22 28:11 110:11 139:6 229:14</p> <p>calling 57:17 187:2</p> <p>calls 63:9 64:15 74:6,7, 8,10,11,14 79:15 101:20 118:25 121:6,13,14 122:4, 24 124:7,12 130:3 133:19 144:11 149:2 163:16 174:19 182:3 186:7 213:11 219:16 229:22 230:11 244:21 257:4</p>	<p>came 12:14 34:24 37:6, 7,8,12,14 38:25 43:19 44:20 51:23 53:6 62:2 64:24 66:4,5,8,10,14,17 83:17 86:6 92:1,3 95:16 100:16 104:25 117:12 131:20 133:8 139:21 176:23,24 179:16 183:4,20 195:24 203:16 233:20 245:18 251:9</p> <p>camera 139:9</p> <p>campaigns 107:11</p> <p>can 5:12,14 6:7,19 7:9, 23 8:21 9:5 18:14 20:21 21:9 23:14 25:2 32:14 97:5 99:2 104:15 106:15 107:1,8 108:15 110:14 112:17 114:4 117:21 124:15 125:5,15,22 131:13 137:20,25 141:20 142:3 143:18,19 145:10, 11 146:15,18 147:6,22 149:5 150:15 152:25 156:5,12 157:14 161:4 163:22 164:2 170:13 173:4 174:25 175:2 178:12 182:7 184:4 188:20 193:4 195:8 204:22 206:4,6,9 215:25</p>
---	---	---	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

230:13 236:1 237:1,18,24 238:21,23 239:8 250:18 255:16 257:16,17 can't 54:21 103:1 111:24 138:8 141:21 164:13 170:5 188:19 190:2 195:21 197:16 238:20 240:11,16 247:14 249:4 251:24 252:15 253:18,20 Canadian 80:12 81:3 canceled 88:3 capacity 228:20 captain 81:14 194:20 captain's 11:18 13:13 14:6,9 15:4,15 82:7 223:12 256:23 captains 194:23 car 63:9,10,12,14 67:5,6,14,16,21,23 68:4,5,12,13,14, 15,17,19,21 69:1, 9,13 71:20 78:19, 20 104:18 122:4 125:20,22,23,24 132:13,15,17,23, 24 133:2,8,18 140:10 160:4 182:17 184:13 226:10 229:19	card 174:23 201:24 202:4 215:7,9 220:1 221:13,23, 24 234:6 cardiologist 227:16 cardiologists 227:19 care 31:14 72:16 89:11 154:21 158:14 228:15 cares 199:19 carrier 15:24 16:8 carriers 16:6 carry 129:19 190:4 cars 90:20 201:20 case 5:5 9:3 130:9 134:23 135:9,11 150:3,19 155:16, 17 162:8 164:8 198:9 220:3 223:21 230:4 cases 122:16,17 140:24 cash 84:16,17,20 85:2, 17 140:17 cashed 41:13 48:20,23 165:14,18 193:11 cast 33:23 158:4	Cat 73:21 Cath 41:9 Causeway 42:4 causing 80:13 celebrated 131:20 cell 15:21 16:14,16 79:15 141:13 237:7 240:4 center 233:11 certain 57:20 certification 5:10 14:13 15:3,16 certifications 11:15 12:4,13,22 14:8,18 15:17 82:5 certified 5:9 13:7 ceviche 63:16 chair 60:7 180:16,17 challenges 59:19 61:25 change 59:12 60:5 61:21 68:1 90:12 181:8 192:8 210:24 229:1,2 changed 22:1,4,11,17,21 55:20 68:9 128:1,2	191:7,8 240:7,8,17 changing 181:7 channels 248:8 chaos 61:4 chapter 20:12 chapters 20:4 charge 55:9,10 108:1 138:21,22 139:7 195:14 215:13 244:16 charged 55:12 138:24 165:6 charges 139:10 220:11 222:4 charter 48:14 195:4 chartered 195:8 Chase 89:15,17,19 cheaper 166:6 check 19:18 68:2,6 84:3, 6 88:3,7,13,16,17 117:9,11 201:24 202:5 207:3 208:12,23,25 209:10 218:2 225:16,17 229:15 checking 89:2,4,17,19,20
--	---	--	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

117:9 128:21 246:19 248:7	claiming 59:8 111:12 113:8, 12,24 114:1 115:3 130:10 139:12 142:6 153:23 156:2 162:3,12,13, 18,22,25 163:14, 20 164:18,19 169:21 172:13 175:25 192:12 193:7 205:4 207:19,20 211:23	clients 6:4 196:14 207:2	column 168:8
checks 87:17,18 88:19 89:3 92:2,15,16, 22,25 93:6,21,22 94:7 156:12 201:8 226:8,9		clock 184:17 191:22	come 29:24 30:6 31:4 32:8 36:2 41:1 50:19 63:2 65:21 71:17,21 75:5,14 86:10 97:15 106:4 109:4 115:25 117:3 127:24 130:20 132:11 133:20 174:20 176:25 188:16 190:20 192:20 211:15 212:8 246:20
CHF 121:20 227:17		close 51:20 243:23	
children 49:9,10		closed 187:1 223:1	
choice 100:11	claims 69:6 142:25 204:25 207:8 221:1 241:17 244:3	clothing 160:4	
choose 13:19		club 42:13 45:10	
Christmas 71:19 131:16,17, 18,19,21,22 132:8	clarified 108:2	CMCS 133:18	comes 171:10 241:20
circumstances 55:6	clarify 185:20	CNCS 28:11 50:14 63:15	Comet 66:5
circumvent 93:18	class 32:7 82:15 117:19, 25 242:22	co-sign 34:4	comfortable 177:5
City 11:5	classes 42:25 43:5,11,15, 20,21,25 117:20 118:13 230:18 242:15,16,17 243:6,17	co-signed 156:23	coming 31:2 36:7 114:24 129:22,23 154:19 176:18 188:16 189:14 235:12
civilian 218:15,20,23		coast 15:5,7,10 41:17,18 81:21	comment 27:1 104:25 105:1 145:11 247:13 251:11
claim 104:1 109:5 111:11,17 112:17, 19 122:22 142:2 159:16 162:7,10 163:5 164:24 168:5 170:11 172:15 173:19 192:20,21 194:9 211:6,17	clear 6:25	Coconut 42:6	commentary 102:9 144:15
claimed 90:1 136:15 192:22	Clerk 135:9	Code 10:1	comments 99:9 100:5 102:10, 12,15 105:10,12 106:1 138:8 247:18,19
	Cleveland 227:19	coke 131:5	commitments 110:14
	click 145:10	cold 41:17	committed
	client 170:12	Colin 249:8	
		college 10:21,24,25 11:1, 2,4 32:6	
		color 185:22	

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>150:5 common 196:11 communicated 207:11,24 Community 10:24 11:1,4 company 17:8,19 18:12 21:4 48:11 65:7,23 69:7 106:18 112:5 156:3 197:11 207:12 219:24 225:16 239:12 254:1 compared 212:9 compartmentalized 23:22 compensate 141:4 compensated 103:14 104:2,4 164:11 competes 17:5 competitor 17:2 complained 130:25 complaint 152:19,23 163:4 168:19 171:25 172:18 220:19 complete 91:19 183:22 217:10 completely 149:16 168:22</p>	<p>complying 213:9 Composite 146:19,20 computer 27:13,17,18,19,23 28:2,22,24 29:2,6 101:19 128:18 249:15 computers 27:20,21 28:12,20 74:20 con 202:24 concerned 202:24 250:13 253:6 concluded 257:22 conclusion 119:1 122:25 124:8,13 144:12 149:3 150:8 163:17 213:12 230:12 244:22 257:5 conclusions 150:15 condition 102:25 204:10 conditions 8:14 103:10 condo 47:25 51:6,9 52:8 62:4 70:23,24 71:1,4 74:23 75:4, 5 78:2 86:13 87:24 88:1,5 202:22 203:6,7,13,25 204:2,3,5,6 224:3 226:1,3</p>	<p>condos 166:12 202:21 conducting 158:17,21 configured 173:13 confirm 49:20 confusing 123:4 connection 21:15 conniption 199:17 consider 90:13,16,23 125:10 176:22 177:13 178:8 228:4 considered 72:8,21 73:2 124:5,21 202:7 considering 124:2 consistently 80:13 109:18,20 180:13 185:12 192:17 console 233:11 constant 130:24 constantly 56:9 97:21 186:6 231:20 consum 255:24 consume 252:4</p>	<p>consuming 250:2 consumption 245:9 257:12 contact 109:12,14,16,17 156:24 213:21,23, 24 241:21 contacted 142:10 container 156:19,22 159:22, 23,25 160:10 containers 159:25 contains 164:24 contempt 108:1 142:11 213:8 contend 87:21 88:5 250:16 content 18:17 19:24 246:4 256:13 contention 108:6 contents 146:23 147:8,15, 17 contest 6:17 continue 32:14 47:5,11 76:4,11 85:14 127:5 158:6 180:17 195:18 continued 142:7 192:18</p>
--	--	--	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

contract 212:18,23	136:7 141:19 150:25	183:10,18,19,20 186:8 187:9,15 193:17 194:10 201:17 213:23 223:9 237:19 241:7 248:9,10 249:20,21,25 250:1 255:24 256:9,12	couples 81:10 195:18
contractor 46:6 218:16,20,24	corners 131:2		course 13:22,24 14:3 32:16 147:21 188:2
contribute 225:3,6	correct 17:11 21:7,14 22:13 37:2 45:7,8, 15 50:2 109:8 114:12 134:15 135:16 136:2 141:9 145:21 154:1,3 163:8 181:3 192:5 212:22 235:24 240:5 242:11 246:18 250:11,16 254:6 256:7	couldn't 27:25 70:1 73:15 88:15 90:25 109:12,22 118:15 119:10,11 124:23, 25 125:22 129:19 131:4 143:6 154:17 162:15 175:18 185:21 194:5,22 195:18, 25 204:6 208:5 239:13	Court 5:3,9 7:23 29:11 41:18 49:20 66:20 78:10 108:1 137:25 142:11 143:19 146:17 153:8,11 161:4,10, 15 164:14 202:12 206:9,12,18,21 213:21 220:12,14 241:7 257:20
contributed 88:23			Court's 142:22
control 33:5 115:10,14 116:16 117:2 118:14 124:20 125:17,18,19,25 213:21	correspond 138:14	Counselors 5:14	courtroom 9:2 205:11
controlled 116:19,23 117:15 123:17	correspondence 119:20	countries 60:25 187:15	Courts 114:6 135:10 139:8 142:20
controlling 107:17	Costa 53:23	country 196:2	cover 165:7 200:17
conversation 217:12,13	Costco 122:13 123:22 124:1	County 10:24 11:1,4,5 135:10	covered 70:2
conversational 7:5	couch 254:13	couple 23:23 36:11 42:1 61:5,6 76:23 77:9 81:10 155:11 156:3 165:8 166:6 167:13,21 176:19 177:17 178:17 181:21 182:13,23 186:21 189:1 196:7 200:8,9 224:22 233:2,3,5 235:7 236:1	covering 67:25
converted 219:7	could 34:16 38:12 46:12 58:25 60:6 62:7,20 63:15 66:20 99:6 112:19 115:7 116:20 117:9,10, 11,12,14 118:14, 24 119:10,11,23 121:19,20 124:20 125:23,24 133:19 137:16,17 138:10, 13 149:6 152:2 165:10 166:5 176:17 182:5		COVID 32:9 37:19,22 43:8 44:17,20,25 45:4, 6,11 47:25 48:1 50:1 55:21 56:2 57:1 58:18,22 59:5,9,11,13,14, 15,22 60:18,20 61:6,10 62:5,24 63:22 64:4 72:1 83:15 92:8 110:9 116:5,9,23 118:18
convinced 110:11			
cook 184:8			
cooperates 121:11			
coordinating 122:15			
cope 228:24			
copies 92:16			
copy 12:18 86:19 135:6			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

120:1,2,3,4,23,25 121:15 122:13 127:6,7,8,9 154:4 175:12 176:3,16, 19,20,21,22,23,24, 25 177:9,13,17,24 178:8,10,17 181:1, 12,22 182:13,24 186:21 187:4,15 189:7 190:6,12,13, 17,20,21 191:2,10, 13,21 192:4,6,9, 14,17 199:25 232:6,9 243:18 249:9	cross 73:15 108:25 109:6,11 111:5 130:11 154:6 226:25 227:20 cruiser 174:20,22 cruisers 36:20 256:15 cruising 79:7 245:20 256:14,18 current 9:8 18:6 106:22 currently 16:9 17:19 customary 249:6 customer 33:20 36:5,6 45:24 64:18 67:17 71:24 72:6,12,18 73:15 127:24 132:19,23, 24,25 133:4 205:24 224:20 customers 21:12 26:11,14,18 34:23,24 44:4,7 63:11 67:5 69:4 70:10 71:17,21 79:3,21,23 80:14, 17,19,20,25 83:11 131:20 133:2,4 185:10,13 187:2 188:16 196:8,9 197:8 205:23 219:15 230:2 245:23 customs 60:25 61:1 186:25 Cuthbertson	5:16 32:14 86:21 105:6 107:1,8 111:1,22,24 112:23 118:25 122:24 123:9 124:7,12,16 125:3, 13 135:6 144:11 146:13 149:2,9 150:12,25 152:25 161:14 163:16,25 170:6 171:14 173:4 191:16,24 192:25 193:24 194:25 195:5 206:6 210:22 213:11 228:12 230:11 236:14 244:21 249:1 250:5,17 252:19 253:11 254:20 255:15 256:1,5 257:4,19 cyber 117:8 134:23 136:13,14,16 cyber-stalking 55:9,10,15 Cypress 42:9	date 8:8 17:11 19:18 65:13 135:14,21 136:4 144:18,21, 24,25 145:1,23 146:9 147:7,8,14, 16 224:4 239:3,23, 25 date's 145:4 dated 220:7 dates 105:25 137:18 172:9,10 208:15 daughter 105:20 day 29:4 30:2,21 34:8 35:14 36:1,16 38:13,24 39:1 56:24 57:8 58:5 60:19,23 62:9,10, 13,15,21 63:24 67:17 74:19 83:19 94:16 115:1 116:1, 3 121:22 122:11 126:16,19,22 127:1,20 130:6 131:17,18,19 132:2,3,6,7,8,10, 11 133:18,21 154:11,24 166:6 171:3,10 174:7,22 176:14 180:3,8 183:3,4,23 184:20, 21 186:9,13,19,24 187:12,16,19,25 188:2,3,19,20 189:19,20 229:7, 13 234:11 235:5, 12 236:5,6,7,9,20 246:17 247:6,7
Craigslist 23:22 24:1 crazy 105:3 177:18 178:24 179:3 186:6 create 13:16,18 106:18, 25 created 18:25 29:23 101:2 105:18 106:13,21 164:6,8,9 219:17 credit 90:25 200:2,7 215:7,9 220:1 221:13,22,24 244:18 Creek 42:6,10 crew 195:9 Cricket 240:8,14,18,22,24 crime 55:12 150:6 237:6			
		D	
		D-I-L-L-O-N 67:12 D-Y-L-A-N 49:21 daily 35:9,10 63:6 122:17,18 246:24 247:1 250:11 damage 69:3	

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

day-to-day 29:8 32:20,22 33:1 34:9,12,13 35:6 55:23 119:7 128:4 days 32:12,25 41:8 45:25 56:25 58:8, 12,19 60:2,13,15, 16 63:4 66:18 72:11,18,24 114:21 126:22 131:4,11 132:8 145:19,24 146:8 154:6,7,12,13,24, 25 155:1,3 170:23, 25 174:4 181:25 187:5 189:5 243:5, 8,16 244:1 de 153:18 deactivated 101:18 106:3,14 148:12 deal 86:11 121:10 188:23 242:5 245:20 dealer 57:16,21 97:19 dealers 97:19 98:7 dealing 131:6 133:24 Debbie 143:18 debit 201:24 202:4 debt 69:10 215:7,9 220:9,10 222:7,15	December 22:18 53:10 168:24 170:3 207:3 208:10,18 209:7 218:17,18 219:8,9 decide 138:1 decided 28:10 90:8 193:21 209:19 decides 202:12 decimal 169:24 defective 83:9 159:15 Defendant's 86:15,17 135:2,4 138:3 146:20 150:20,23 152:20 153:6 161:18 172:25 204:11,12 214:21 217:3,4 220:21 223:15 224:10,11 Defendants 5:19 86:25 207:25 208:14 defibrillator 41:11 definitely 14:23 101:1 126:20 127:22 Definition 196:25 degrees 11:7 delete 100:6,7,14,18,24	deleted 237:20 deliver 71:22 122:14 123:22 159:24 160:1 175:1 delivered 85:25 159:22 160:1 demand 153:5,16,18,21 168:25 169:15 170:11 208:9,22 209:8,13,16 demanded 202:20 208:7,11, 14,20 209:1 demanding 137:15 138:11 141:9,13 142:1,17 demands 201:3 208:16 demo 13:19 demoing 198:15 demonstrate 231:23 demonstration 166:25 167:4,5 198:21 demonstrations 70:9 denote 185:16 department 36:9,10,18 37:1 depended 35:14 180:8 183:7	dependency 134:13 depending 166:5 depends 253:21 depicting 149:18 deposed 216:2 deposit 85:17 87:24 88:12, 24 207:4 deposited 89:4 deposition 5:1 6:3 8:2 46:18 78:14 137:21 138:9 161:9 217:11 241:13,23 257:17,22,24 Desalination 17:9 18:12,23 19:1,6 20:9 21:5, 16 24:14,18,23 48:6 Desantis 121:4 Describe 208:13 description 108:17 248:20,24 desk 27:20 desktop 28:16 destroyed 211:20 determine
---	---	---	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

161:24 218:12 diagnosed 157:17 158:11 didn't 13:17 23:24 31:8 38:13,18,23 39:4,6 41:16 49:15 57:21 60:2 63:11 64:8 66:12 68:1 71:21 72:7 75:16 82:8 85:1,12 86:8 88:12,17,19 89:22 90:13,20,23 92:20 95:15,20,21 96:2, 18 107:5,16 110:7 114:21,22 115:16 119:4 120:13 123:5,6 125:6,20 127:14 128:11,16 129:8,16 130:18, 19 146:11,12 150:15 152:14 158:2 160:24 163:21 165:22 167:22,23 175:15 176:25 184:3,25 186:1,16 190:4 192:10,20 193:10, 12,14,16,21 194:9 195:11 196:2,4,5 201:14,16,19,25 202:14,22 204:2 205:12,17,19,20, 21 206:15,17 208:24,25 210:1 212:8 213:22 215:10,12,14,17, 19 216:17 217:19 223:2,6 225:16 226:8 227:8 234:6 236:7 238:4 240:19 242:20 244:16 247:21,24, 25 249:9,21 251:1, 22 252:7,10,13	253:6,22 255:13 die 56:19 58:16 died 23:5 159:18 Diego 41:16 166:8 diff 172:3 difference 171:23 172:1 different 11:20 12:20 36:21, 25 42:8 59:7,19 61:3 78:16 101:25 102:10 107:21 110:14 116:2 148:14 152:2 168:11,15,18,20 172:4 182:6 235:7 240:9 247:9 256:13 difficult 122:20 128:25 difficulty 242:5 digital 141:19 Dillon 5:16 6:22 67:7,10 93:5 132:16,18 206:4 257:15 diminishes 228:21 dinghy 71:17,23 80:8 174:21 dinner 57:4 71:18 116:2 184:2 197:2,3	direct 5:24 64:18 99:23 107:11 159:11 213:23 directed 101:23 164:24 direction 232:20 directive 34:6 105:22 108:10 115:5 directives 121:24 directly 62:16 76:1 170:24 216:11 218:4 discount 236:21 237:2 discussed 105:12 136:13 164:21 discussion 33:19 46:16 78:12 99:10,23,24 161:7 241:11 247:3 251:12 display 40:21 151:23 displays 56:7 disposal 115:4 166:24 disposed 85:20 86:6,11 156:8,17,18 160:9 dispute 255:12,19 disrespected 54:16	distinction 231:13 distinguish 107:5 diverted 106:10 diverter 185:24 dividing 200:13 division 251:22 divorce 49:2 165:17 206:16,17 215:10 divorced 49:5 206:18 doc 227:18 dock 71:17 80:7 157:12 198:18 200:18 dockage 75:14 78:3,5,6 docked 197:7 233:6 doctor 157:19 158:5,18 227:8,9,11,24 229:15 doctor's 122:4 157:18,25 158:10,14,15,16, 17 226:24 227:3,4, 21,23 228:8 229:9, 23 doctors 228:23 229:4,21 document
--	--	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

86:24 153:13 156:5 161:22 163:4 169:24 171:6,23 172:6,10 173:3,7 184:23,24 185:7 212:3 223:21,22,25 224:14	146:10 147:1,4,5 149:15 151:14 153:18 156:4 164:3 165:15 170:12,13,14,19, 22 171:9,16,19,20 172:21 173:12 180:9,10 181:7 188:18 191:19 192:23 193:1 199:2 205:24 211:15 224:1,4,6,8 227:7 234:6,23 239:18 242:4 245:1 246:25 253:12 255:21,22 257:14	149:12 156:25 157:16 160:11 176:17,23,24,25 178:19 183:25 212:14 225:17	dumped 86:8
documentaries 248:14		download 116:1	during 23:1 25:23 28:25 35:9 36:11 41:8 47:25 49:18 56:16 60:16 61:10 62:13, 21,24 72:1,17 74:4 76:16,20 77:14 79:9 92:8 105:24 108:5,22 109:3 111:4,13,17 113:8 115:1 116:20,24 120:1,3,4 122:13 124:3,6 129:16 130:6,11 132:13, 17 133:9,12,18 137:21,23 138:8 139:14 154:3,19 157:23 174:17 175:12 176:16,19 178:16 179:23 180:25 181:21,24 182:13,23 183:4, 23 184:1 186:20 187:19 188:1 190:21 192:17 200:5 202:10 229:13 242:14,18 244:7 245:6
documentation 81:14,17,19 82:6 196:3		downstairs 28:14	
documents 130:9 151:2 156:7, 11 164:9 242:1,4		drama 29:23	
doesn't 6:24,25 36:21 97:3 109:4 147:14 170:24 172:6 173:11 187:16 193:6 211:23 214:7 228:24 240:5 246:11,20 256:3	done 19:8 36:6 38:17 39:3 57:8,9 58:21 74:11,16 99:14 103:14,17 108:4 142:2 150:15 153:22 154:21 157:1 176:17 211:20 242:25	draw 230:8 257:11	
dollar 201:15,17	door 53:19	drinks 197:2	
dollars 107:9 156:4	doubled 40:14 177:21,22 190:21	drive 63:11 67:5,6 68:24 86:8 125:22,23,24 229:16	
domestic 139:7	doubling 177:25	driver's 11:10,12,14 229:24	
don't 6:5 14:20 16:17,22 20:20 33:14 42:11 44:13 54:20 59:13 65:21 69:11 71:2 73:17 86:19,21 88:2 89:5 90:7 93:6,8 100:18 109:4 113:11,18, 22 137:20 138:7, 23 145:4,23	down 7:9 9:2 31:3 33:18 35:1 39:19 41:13, 17 43:8 44:20 56:20 58:16 60:7, 25 61:2,8 83:15, 18,19 93:14 98:19 106:15,16 108:19 111:22 121:1 135:11 140:20 141:22 148:9,19	driving 45:10 229:23	
		drop 63:13 139:10	
		dropping 195:17	
		drove 67:9 186:6	
		drunk 32:13	
		due 33:22 41:7 60:8 221:20 222:4	
		DUI 104:19	
		duly 5:22	
			duties 34:15 35:15 40:24 50:11 141:5 157:1, 3,4 160:11,12 195:15
			Dy 95:8
			Dylan 31:7,9 49:13,19, 21,24 50:15,22 51:1,7 62:2 67:9 93:5 95:6 126:11, 12 128:3,21 160:16,21 179:15

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

216:3,15,24 217:13,22,25 220:4 225:5,10 Dylan's 31:7 225:4,11	198:13 224:24 earn 11:7 223:8 earned 141:5 eased 121:8 easily 188:5 Easter 131:14 174:24 easy 81:21 eat 62:16 79:25 120:19 eating 121:9,10 eavesdropping 184:18 186:6 188:9 economy 82:15,17 Edward 49:13 EEG 11:24 EEGS 11:23 EEKG 11:24 effect 136:11 effectively 124:24 126:5 ego 217:22	eight 68:24 132:18 193:12 219:4 either 11:7 21:24 22:1 70:24 84:3 88:19 132:20 137:1,4,10 199:11 206:23 235:1 EKGS 11:23,25 electric 48:13 243:13,14 electricity 70:11 Electro 11:23 electrophysiologi st 227:17 elevator 204:7 else 24:21 41:21,24 43:19 49:4 54:19 57:1 74:10 91:25 98:21 103:25 104:6,20 105:4,16 107:10,14,16 119:23 131:2 164:19 167:15,18 185:23 201:8 209:7 229:13 257:15 elsewhere 30:9 embarrass 109:4 emergency 156:24	employee 34:6 40:8 46:6,8 50:6,9 52:25 53:4 54:2,5 122:7,23 123:8 130:23 131:4 132:11,14 employees 33:13 34:5,24 39:4 40:5,6,11,19 55:1 60:3 63:10 67:5,6 84:13 92:23,24 93:13 103:7 124:22 125:1,7 126:4,5 128:24 130:20 131:1,10 244:13 250:20 employment 155:13 enabled 100:24 101:23 encounter 148:1,5 end 24:24 37:9,15 61:1 90:3 109:18 126:15 128:1 133:21 174:22 212:14 217:25 ended 44:10 67:15 73:16 120:9 204:1 222:18,19 ending 87:4 163:6 endurance 6:17 enforcement 110:15 engineering 50:15
E			
e- 23:24 e-mail 23:12 25:3,6,9,24 26:3 64:17 95:15, 22 96:14,16,20 109:22,24 137:14 138:10 141:8,20, 25 142:15 144:25 145:7,13 146:9 156:15 212:25 e-mailed 95:12 e-mails 23:1,3,7,8 24:8 25:1 26:2,10,13,17 57:6 63:22,25 64:2,5,9 91:2 101:20 159:9 182:4 185:19 187:6 188:8 230:7 each 62:8 143:16 151:11 152:14 203:9 215:22 223:11 247:12,17 248:1 earlier 154:4 168:4 183:8 218:3 226:4 earliest 56:19 early 60:8 160:15			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

English 13:11	138:1 214:8 215:21	evaluation 111:9	174:19 185:23 212:7 220:12
enjoy 72:7 73:3 108:15 193:22 237:6	entitlement 54:21	Eve 131:17,18,22 132:1	evidence 150:9,10,13
enjoyed 73:18,25	entity 15:19	evening 56:4 57:15 60:8 64:6 115:17 116:20 118:13 173:25 189:4 245:6	ex-husband 212:10
enjoying 197:6 257:7	environment 116:23 117:7 118:21	evenings 32:24 56:5 97:13 114:15 116:12 117:16,18 118:16 252:5,13	exact 19:18 36:19 44:13 65:20 69:11 73:22 92:4 100:19 151:14,17
enough 6:7 7:11 69:23 211:8	equipment 13:19	eventually 38:20 51:23 66:15 118:6 120:7 179:16	exactly 81:12 99:11 212:21 225:20 227:7
enter 80:11	Ernst 93:1		EXAMINATION 5:24
entered 86:18 135:5 136:1 138:4 141:8 142:5 144:17 146:21 148:2,6,11,20 149:12 150:24 152:21 153:7 161:19 173:1 204:13 211:5 214:22 217:5 220:22 223:16 224:12	errand 125:2,12,21		exchange 95:22,23 188:8
	error 130:13	every 32:5 35:14 40:14 60:15,19 62:10,15 93:25 94:16 96:18 114:23 115:10 126:19 155:25 171:2,10 177:22 180:3 205:24 208:13 209:9,16 246:17 247:7 251:2,7 252:23	excuse 14:1 34:21 43:16 47:16 56:10 74:2 77:12 83:9,10 112:15 138:11 163:2 168:14 206:21 222:19 239:24 246:3 251:21
	escalated 204:10	everybody 93:25 121:17,19 130:15 131:23 150:4 201:8 209:10	Exhibit 86:17 135:4 136:21 137:25 138:3 146:20,24 150:21,23 152:18, 20 153:4,5,6 161:17,18 163:3 168:9,18,25 171:23,24 172:17, 23,25 204:12 214:21 217:4 220:19,21,25 222:24 223:14,15 224:11
	especially 36:24 137:23 176:16 199:25 228:20 244:12	everyone 61:16 84:13	
	essential 61:11 179:4,7,8	everything 31:20 33:6 129:18, 20 131:2 164:12 165:4 167:14,18	
entering 33:11	establish 18:14		
entertain 71:18 79:22 196:14	established 184:16		
entertaining 79:21 80:12	estimate 180:11 182:22 183:6,12,13		
entertainment 196:16	estimates 188:24 190:17 191:13,14,19		
entire 41:18 115:4	ethic 50:18		
entities 15:18	Europe 182:3		
entitled			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

exist 63:20,25 64:2	expunged 138:25 139:4,5 140:22 206:23 215:14	fact 64:14 85:24 92:20 96:2 129:18 143:18 150:5 208:25 212:8 229:20 255:22	fart 65:20
exists 63:1 141:19			fast 127:13 175:13
expect 210:24	expungement 138:19,20,24 139:1 141:1 143:25 213:3,7	factor 193:6	favor 7:10 72:5 212:10
expectation 209:22,25 210:4, 16	extended 56:24	factored 211:23	FCC 15:12
expected 210:25 211:1	extent 202:15 228:19	failed 142:24 212:24	fear 116:23 119:25
expecting 143:9	extra 178:5	failure 41:7	features 100:20
expense 89:8,10	extravagance 194:16	fair 6:7 7:11 162:16	February 37:9,10,15 94:13, 19 120:21,22 121:4 127:10 128:1 152:8,15 155:23 160:15 163:7
expensed 81:9	extremely 126:7 131:5 202:24	Faith 7:18	fee 200:18
expenses 71:11,16 89:12 165:5 166:14 167:13 193:4 194:13 200:3,7,13, 18 225:7	Exumas 83:13	fall 12:12,13 14:9,13 15:14	feedback 11:23
	F	familiar 37:3	feel 91:4,5 119:4
expensive 203:11	Facebook 18:9,11,22,25 19:3,21,24 20:3, 11,14 24:7 98:24 99:1,5 100:2,4,8, 25 101:2,5,8,22,25 102:4,21 103:12, 15,20 104:10 105:18 106:2,4 119:20 136:16 147:24 148:4,12, 18,21,25 149:14 245:15 247:10,19, 20 255:22 256:9	family 50:23	feeling 12:2 228:21,24 229:3
experience 249:5		far 18:13 20:18 29:1 34:9 63:18 110:7 111:11 114:1,4 115:24 119:25 129:21 130:2,14 133:23 146:23 156:10 183:17 204:8 237:7 250:13 253:6,22	fees 208:5 220:12 222:5
explain 21:9 94:25 114:9 153:21		Fargo 87:4 89:14,20 92:15 219:19 220:1,8,20 221:1, 5,9,12	feet 143:7 179:21 194:5
explained 21:12 101:11 164:5	facility 108:22 109:13 111:5		felt 105:13 183:7
exponentially 193:18			ferry 195:20
exports 189:8			few
expressing 33:6			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

21:11 26:15,17 32:25 52:10 57:4 63:5 93:4 206:3 247:7 fiddling 233:16 figure 20:24 60:24 62:8 115:21 121:22 146:6 224:5 figuring 98:1 201:11 filed 108:23 111:18 112:4,8,16 113:4,9 134:23 163:11,24 164:15 172:19 213:17 214:10 219:20,23 220:20 files 213:19 filing 111:14 135:14 fill 90:25 183:19 filled 123:20 Filling 123:11 film 231:23 234:2 filters 66:2 final 141:24 finally 52:10 find 30:24 41:16 48:21 58:1 92:22 98:19	107:24 113:23,25 116:19 117:16 141:18 142:3 169:16,23 170:2,9 171:5 182:7,21 186:25 187:14,18 204:2,5 213:8 234:15 235:4 251:8 finding 140:17 204:1 fine 158:5 finish 7:10 10:15 105:9 199:18 241:10 fire 34:6 119:6 128:8 fired 105:24 first 5:22 13:5 30:15 31:17 41:1,8 46:23 47:1 52:21 53:1 55:22 82:15 127:10 142:5,14 145:12 166:16,17 178:1,17 179:20 186:21 199:3 202:22 210:11 211:6 214:20 217:9,15,16,21 219:2 fitness 11:19 12:23,24 13:10 14:23 41:25 42:2 43:16,17 44:23 45:5,15,25 46:3,21,25 47:17, 18,21,22 48:3,5 116:5,10 117:18, 21 133:14 230:23 231:1,5,9 242:18	five 11:20 12:20 41:9 49:18 108:23 114:21 186:24 199:4,5 202:10 fixed 69:3 flew 82:14 floor 27:24 28:7 31:18 94:16 Florida 9:10 10:1 11:10 17:10 41:1,22 46:24 47:1 49:14, 16,24 51:1,7 73:10 121:10 135:10 166:7,11,15 178:19 200:4 219:4 fluctuated 242:10 fly 83:18,20 focus 176:1 182:5 follow 157:20 followed 171:11 followers 106:24 107:4,23 follows 5:23 foot 40:2,3,17 47:23 48:3 68:10 179:10, 14,24 180:14,25 181:5,11,23 182:14,23 186:22	footage 234:19 force 157:5 forced 157:2,3 160:12 forever 97:22 Forget 147:8 forgetting 23:24 forgive 14:2 121:3 form 111:1 123:9 125:3, 13 149:9 150:12 163:25 170:6 172:22 191:16 192:25 194:25 195:5 210:22 228:12 249:1 252:19 254:20 256:5 formal 117:7 format 141:19 170:17 formats 170:19 Fort 9:9 41:19 71:25 forth 6:11 7:5 132:20 137:21 141:4 229:16 235:25 forward 163:14 forwarded 101:20
---	--	--	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

found 131:5 151:21 250:11	239:25	182:3 183:20,25 198:4,5,8 199:19 202:5 203:7,13 204:7 207:2 208:9, 14 209:1,8,13,16 211:19 212:9 213:4 214:2,9,11 216:14,15,18 217:19 218:4,12 219:13 220:8 221:4 222:17,20 230:23,25 231:5 232:12,16 235:16, 18 236:25 237:8, 12 239:4 240:13, 17 242:10 253:7, 17	further 82:5 225:19
four 8:11 33:10 37:8 44:4,6 60:23 61:8 67:15,18 72:11,18, 24 90:8 132:23 143:15 154:12,13, 23,24 155:1,3,6 171:2,10 182:6 186:24 188:5,6 192:1 199:3 207:14 210:8 247:9 248:2,3,5	friendly 80:22		<hr/> G <hr/>
fracture 157:10 158:11 226:25	friends 7:6 80:15,16,19 196:10 197:8 246:13,16 255:22 256:3		gallbladder 41:10
France 187:3,8 189:8	from 10:17,23 11:7,12 17:13 25:4,6,18,25 26:2,4 28:11 29:4 34:16 35:8 37:25 40:16 41:12 43:12 44:16 45:10 46:10 47:20,22 48:2,14, 18 49:2 52:1,4,5,8, 16,21 53:19,24 54:3 56:15,17 57:10,12 58:1,5,14 60:10,11 61:13 62:12 65:5 66:1,4, 15,17 69:16 70:15 71:24 72:19 73:9 74:14 83:20 84:4 85:2 87:3,4,9 88:14,19 89:3 90:24 91:21 93:20 97:17 98:3 99:8,17 105:25 106:19 107:5 108:18 110:25 112:21 114:18 115:3,25 116:1,14,15,21 118:16 120:15,25 128:16 133:9,14, 18 135:9 137:10 140:18 141:13 142:6,9,16,17 143:9 145:8,16 153:5 155:24 159:11 160:16 164:22 165:17 167:13 178:14 179:25 181:11	front 27:20 28:4 40:21 151:24	gas 165:8 166:2
Francis 8:7 49:12		frustrated 38:25 124:21	Gates 224:16
Fred 154:19		frustrating 131:6	gave 8:21 45:19 65:12 67:17 68:24 84:17 85:15,18 96:2 100:11,15 115:5 118:6,13 125:20 131:17 133:7 170:16 242:18
free 22:9,23 56:12 89:22,24 167:2		fudging 93:15	general 251:6
freebies 185:12		fulfill 57:23	generally 14:22 56:3 97:16 98:13 127:4
Freight 63:17		full 104:19 126:25 130:15 162:4	generous 199:24
French 80:12 81:2		full-time 165:19	gentleman 66:4
Friday 60:13,14,16,21 126:20 127:19,23 128:17 129:15 130:16 131:8,12 173:24 174:10 180:20,24 181:12 182:20,24 187:25		fully 195:8	geography 33:7
		fun 20:5 48:7 197:11 236:18 245:13,22 256:20	Germany 61:3
		furniture 86:12,14	get 6:19 7:4 12:15,18 36:3,18 38:7 56:5 57:8 60:4 67:16 72:14 74:24 80:1,3 84:3 91:4 95:18 97:16 98:22 99:13 100:16 109:19 114:22 115:25

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

117:12 121:6,7,13, 15,19,20,22,23 122:11 124:1,23 126:3,7 127:15 128:23 129:8 130:23 133:15 134:11,16 135:18, 20 141:23,24 147:23 157:17,18 158:10 159:16 160:15 164:11 171:20 176:17 178:5 180:1 181:9 182:10,15 186:15 193:16 195:8,20 197:21 199:2 200:2,7 201:7 206:4,8,9,18 209:23,24 210:5,6, 10,13,17 211:19, 23 229:14 230:22 233:13 234:10 235:15,16 236:15, 17 242:25 244:18	girl's 115:17,20 116:18 girlfriend 104:22 105:21,25 122:21 123:8,12, 25 girlfriends 116:18 give 8:22 35:15,16,19 44:11,14 65:21 67:5 84:16 91:8 95:25 96:4 97:7 116:1 143:2,10 162:15 209:9 215:25 245:2 247:25 250:9 given 8:2 50:16 57:22 63:10 67:6 104:18 116:20 249:23 giving 44:10 53:21 54:6 84:19 108:10 174:23 glanced 218:14 Glenn 93:5 130:21 go 6:16,18 7:1,11 28:10 33:3,14 35:25 36:3,21 44:3 53:19 56:3,15,23 57:5 63:16 86:3 92:20 97:5 98:18, 19 104:23 110:22, 23 111:24 112:17 113:2 114:4 115:16,20 116:22 117:9,21 118:19 119:3 120:8 123:2,	9,16 124:16 125:11,13 126:14, 18,23,24 127:2,24 131:2 133:13,17 137:1,3,6 149:5 154:18 157:15,17, 20 158:3,10,13,14 166:2 172:6 174:8, 23,25 175:1 180:23 182:16 183:8 184:3,5,10 186:2 187:9 188:19,20,25 189:1,6 193:18 194:20 197:1 201:9,13,14,16 206:18,20 214:17 219:8,9 223:7 227:8 228:23 229:4,8 231:22,24, 25 233:25 235:15 240:11,25 243:10 247:12,17 248:1 250:6 257:6 goal 13:15 goes 49:12 155:17 178:23 179:3 217:22 222:20 229:5,7,9,10 going 6:2,11,13,24 7:7 8:10 30:14 36:21 45:14 53:23 54:10 57:2,3 59:17 61:12 62:1 72:7 79:25 80:15 90:10 95:18, 19 96:1,5 97:8 103:16 104:23 105:2 107:7 110:25 117:13 118:20 119:6 120:9 128:8 130:5 131:1 132:20	138:14,18 140:9, 20 141:3 143:10, 16 146:13 147:10, 12 158:4,5,8 164:11 166:9 175:12 178:1,3,12 179:8 180:23 185:24 186:8 193:22 195:20 196:6 200:23 201:1,5 202:25 203:3,17 209:20, 23,24 210:5,6,10, 13,16,21 211:11 214:11,13 220:13 221:3 225:9 226:22 228:15 232:8 235:20,23, 25 236:24 241:9 245:5 247:2 248:23,24,25 250:25 253:4,21 255:6,21 gone 16:6 32:5 37:20 78:24 114:25 good 5:3 6:1 41:8 121:21 183:17 197:14 232:24 goodness 42:3 Google 98:19 119:21 143:23 144:1,15 145:6,7 147:23 246:19 247:3 gotten 86:7 90:1 95:14 210:12 government 15:19
---	---	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

grand 203:2,3	247:5	41:9,10,11 44:4	20 158:13,14
granddaughter's 82:21	grow 175:21 185:4 222:15	45:23,25 47:10 48:20 49:7 50:18 51:11 52:14 53:16, 17,20 55:8 57:3,7, 21,22 58:20 59:18 61:16 63:1,10 66:4,9,13 67:7,14, 18,19 69:24 70:5, 13 71:18 72:8 75:19 79:2 80:12 81:13,14,17,18 83:9,10,20 84:10, 11,13,14 85:19,24 86:1,7,11 88:23 89:15,17,19,20,22 90:1 93:6,12 95:12 97:23,24 98:13,24 101:23 102:1,13 103:7,13,14 104:7, 16,17,18,19,22 105:14,18,24 106:11,18,25 107:15,25 108:2,4, 11 109:14,16,17, 24 110:11 111:8 114:10,25 115:10 116:16,18 117:24 119:4,13,14,15 120:11 121:4,8 122:1 123:22 124:20 125:1,17, 19 127:23 129:2,3, 6,8 131:8,20 132:21,23,24,25 133:1 134:9 135:23 136:22 137:14 139:12,14, 17 140:2,15,17,22 141:5,8 142:1,10, 13,20,24 143:15 146:16 147:18 148:1 149:13 150:2 151:20,22 154:8,14 156:19, 21,23,25 157:1,10,	159:4,8,16,21,25 160:3,10,19 163:12 165:14,23 166:23 167:6 168:4 173:20,22 175:19 177:3,14 178:2 183:8,22 184:19,20,21,23 185:4,23 186:18 189:11,14 193:18 194:8,13 195:19 196:1,8 199:17 200:17 203:12 204:10 206:20,23 208:22 209:9 210:18 211:10,20 212:7,23 213:2,3 215:7 216:10,25 220:9 221:4,19,23 223:12 224:2,20 226:6,10,14 227:4, 7,19 234:13,20 235:7 238:2,9 240:7 242:15 243:13 244:13 245:10 246:4 249:19 250:2,14, 24 251:18 252:1,3 253:4,25 254:2 255:9 256:16
gratuitous 211:24	guard 15:5,7,10 81:21		
great 86:11 242:5 256:16	guess 22:17 147:22		
great- 160:2	guessing 24:9		
Greece 79:2,7,18 80:21 82:19 104:17 108:5 115:7 140:18 155:10 194:17,20,23 195:3 196:6 197:3 224:22	Guest 66:2		
Greek 82:8 195:25 196:6	Gulf 41:18		
grew 34:18 38:6 40:23, 24 57:14 127:13 175:13 185:5 222:10,12,13	gun 54:24 55:4,7		
groceries 71:10,15 75:2 78:19	guns 55:9 104:25		
grotesque 103:16	guy 31:18 66:8,13,17 93:3,7 101:19		
ground 166:5	guys 32:14 66:10 236:11		
group 11:19 99:10,24 100:1 247:3 251:12,13	gym 43:8 44:20 118:21, 23		
groups			
	H		
	had 13:1 16:12 20:7 23:5,17,18 28:12 29:8,9,24 30:6,13 31:1,7 32:7 33:9, 23 34:2 35:7,17 36:7,9 38:15,16 39:3,5,7 40:1,4		hadn't 90:1 95:14 104:2 118:8 153:21 162:15 165:4 221:22 245:16
			half 86:12 90:8 96:2 127:1,10 165:5 202:9 244:7,9 254:14
			halfway 195:23
			hand

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

145:17	hard	82:5,7 86:9 87:25	221:1,9 223:6
handle	50:18,21 122:9	88:3,7,11,12,15,	224:1 225:13,16,
35:7 119:16 126:3	192:6	17,19 90:20 91:2,	19 226:8,20 227:1
handling	harder	19 92:25 95:15,22,	229:8,15 230:22,
33:13 34:13	190:12	23 96:18 98:4,8	25 234:6 235:3
handout	has	99:18 100:3 101:9,	236:9 237:19
84:13	20:10,25 21:17	23 102:1 103:17,	238:4 239:18
hands	31:19 39:19 41:7	22 105:10,21	240:5 241:15,17,
140:8	42:8 50:18 104:14	106:7,25 107:22	19 242:5,14,20
handwriting	106:24 120:5	109:12,22,24	243:1,14 245:25
223:18,19	142:19 150:19	110:7,12 115:14,	246:13,16,25
handwritten	156:15 171:12	17 117:2 119:24	247:17,25 248:1,
35:16	172:12 197:12,24	123:11,16 124:22	17,19 252:15
hang	228:22 229:4	125:11,18,21	253:8,15 254:7,9,
106:15 137:19	231:19 245:20	127:14 128:10,11,	14,17 255:3,12,18,
231:25 233:25	257:24	16 129:16 130:13,	22 256:20 257:14,
235:20 237:1	hated	14 132:7 134:12,	15
hanging	193:20	25 135:6 137:25	haven't
232:2 233:21,22	have	138:24,25 139:4,5	14:19 18:15 19:2
237:2	6:18 7:14,19 8:2,4,	140:24 141:10,11	21:6 86:13 160:5
hap	14 9:11 10:7	142:2 145:12	182:6 206:1
101:16	11:10,15,18,19,20,	150:25 152:23	210:12 219:19
happen	21,22 12:2,8 13:21	153:13,22 154:5	having
67:13 95:20 96:6	16:1,16,25 17:16	155:7 156:4,21	5:22 55:6 107:17
110:14 143:12	18:1,3,9,11,19	157:17 159:1	119:25 122:13
158:8 189:3 196:9	19:8,24 20:2,4,14,	160:12 161:22,24	131:10 157:14
197:8	19,23 21:11,12	163:5,13 165:22	189:7 197:3
happened	22:1 23:12,15,16	166:1 167:22,23	he
30:21 67:20 96:7	24:8,11 25:21,24	169:24 170:23	6:22,23,25 7:1
101:16 143:13	26:2 28:1 33:15,	172:4 173:3,11	26:6 27:21,24,25
150:14 159:6	19,24 36:2,7	174:20 175:19	28:7,10,14,15,17
172:21 202:6	38:13,23 39:4,6	180:9 184:2,25	30:14 31:3,10 34:7
232:6,8 249:9	40:10,11,21 41:21	185:19 186:16	35:16,24 36:4,6
happening	42:2,23 44:22	188:18 190:23	37:8,12 39:1,5
124:3	46:22 48:7,13	191:8,13 193:5	41:6,7,10,11,13,
happens	49:9,10 50:4,15	194:15,17,22	15,18 43:1 44:4
124:6	51:8 55:1,4,12	197:1,12 198:25	50:6,9,10,13,14,
Harbor	57:18 60:2 61:17,	199:3,14 200:10,	18,20,21 51:2,8
63:17	24 62:15 63:4,11,	17,18 201:14,16	54:10 55:24 57:7,
	23 65:6,11 66:24	204:15,25 205:11,	19 59:16 62:3
	68:2,6,21 69:1,16	19 210:16 211:7	63:13,14,15,16
	70:3 71:17,21	214:1,4,16 215:2,	64:15 66:5,6,8,9,
	75:6,16 77:16	18,23,25 216:3	10,18 67:7,14,19
	78:24 80:16 81:19	217:7,9 218:11	68:24 69:3,10 70:9
		220:15,16,17	72:13 79:14 81:6,8

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

82:7 84:9,12,17, 21,25 85:6,15,19 86:6,8,10,11 88:11,22 89:11 90:10 91:8,9 93:15 94:6 95:15,18 96:1,2,18,25 97:2, 8,15,16,17,20,24 98:3,6,9 103:1,3,6, 7,8 104:16,17,18 106:11,18,25 107:9,13 115:5,10, 14,16,20 116:5,8, 24 117:2,3,4,10 118:17,20,21 119:6,13,16,17 120:7,8,10,11,13, 20,22 121:5,8 122:2,10 123:3,21 124:15 125:17,20, 25 126:7 128:8 130:24,25 131:5 133:17,19 134:3 135:20,23,25 138:14 139:9,15, 20 140:6,17,18,19 141:4,5 142:8,13, 14,24 143:6,8,10, 15,17 146:16 154:16,17 156:8, 10,15,17,18,20 157:4,12,19 158:8, 24 159:8,24 160:1, 9,12,16,19,23 162:16 165:4 166:24 167:15,18, 22,23,24 175:18 176:23,24 177:5 178:5 179:16 180:1,7 184:19 185:15,24 186:2,7 189:9,10,12 193:11,19,20 194:5,7,10,11,16, 19,20 195:12,13, 20,21,24 196:1,3,	22 197:24,25 200:3,7,8,16,17, 18,22,25 201:1,2, 3,4,5,6 202:13,20 204:6 207:12 208:3,4,11,22,25 210:1,20 211:10, 11,19,20,22 212:2, 8,10,23 213:3,19 214:2,4,8,10,11 216:4,6,8,10,20,24 217:1 219:5,6,7, 13,14,15,16,18 224:20 225:6,9,10, 12,16 226:8 227:19 228:20,23 229:4,21,22 230:4 231:17,19 233:16, 17 234:8 237:19, 20,24 238:18,21 239:2,13 240:12 244:16,17,20 245:5 249:9,10,19, 21 250:1,14 251:6, 7,12,14,15,16,20, 22,23 252:1,13,17, 21,22,24 253:6,8, 22,25 254:2,6,7, 12,17 255:3,4,6,9, 12 he'd 90:11 98:8 he'll 229:21 he's 6:23,24 35:23 41:7 65:25 69:5 112:23 116:25 156:11 214:7 228:24 231:20 237:25 244:25 245:1 255:6,21 head 6:10,12 131:5	183:17 heal 158:9 health 59:19 60:8 103:6 hear 13:17 113:23 186:8 253:7 heard 142:5 156:10 hearing 135:25 136:7 137:1,2,3,6 heart 41:7 204:10 heavy 103:1 heck 246:11 height 120:4 held 46:16 78:12 161:7 184:14 241:11 help 39:2 62:2 72:6 111:24 helped 71:24 179:15,16 helping 80:7,8 194:9 209:24 hence 170:20 245:5 Hendricks 9:9 her 30:1 31:3,17 34:2 36:16 54:6,21,24	93:6 95:9 96:6 104:17,18 105:1, 21,25 107:20 111:22 162:15 205:10,11,17,22 206:6 207:25 217:22 245:5 254:15 here 6:3,19 8:16 31:3 46:24 49:14,16,19, 24 51:1,7 85:21 87:8 109:3 122:20 140:24 145:4,23 165:1 166:7,10,15, 16,17 193:13 200:4 206:23 208:8 236:19 241:10 Hey 197:1 hid 253:16 hide 39:6 high 10:15,18 204:6 him 7:1 41:7 50:16 56:14 57:18,22 66:7,15 84:11 86:4 89:23 90:11 91:3,7 93:11 95:13,15,16, 21,23,25 96:4,14, 17,18 97:13 102:25 115:18 118:15 121:7,13 122:3 124:23 125:12,25 131:6 138:17 139:9,17 140:3,4 141:2,15 142:7,17 143:1,5,9 149:17,20,25
---	---	---	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

160:20 175:19 177:22 194:18 209:21 210:11,18, 19,20 211:19 212:7,25 213:10, 23 216:8,11,12,20, 21 227:16,17,18 229:9 231:19 250:10 251:10 252:16,18 253:17	158:25 159:8,9 160:7 164:25 175:22 179:3 182:17 186:7 193:17 195:25 196:1,2 197:21,24 202:1 204:10 207:12 218:13 219:13,24 220:1 227:4,12,15 228:23 230:14,16 231:16,20 232:19 235:2 237:14,19 250:19 251:17	119:15 133:21 179:4,5 182:2 183:8,20 184:6,10, 11 189:6 192:1 225:18 243:10,15 245:6	109:7 114:3 124:4, 6,11,18,19 130:10 141:5 143:16 153:25 154:1,5,9, 11,13,23,24 155:4, 7,23 156:5,24 157:1 160:11 163:2,6 170:16 173:9,16 174:6 175:7,10,11 178:5 186:9,19,24 187:11,12,16,18, 22,24 188:3,5,6 189:1,19 190:24 191:2,8,10,11,14 192:1,2,8,9,10,12, 15,18 195:14 199:23,24 201:12 203:18 207:8,9,14, 16,19 209:11 233:2,3,5 244:4
himself 69:3 175:18		honest 9:6 66:13	
hire 29:23 30:14 38:18 206:17		honestly 44:13 56:18 173:12 228:7	
hired 29:15,25 30:1,16, 23 61:15 186:17 194:22	history 99:14 100:4,8,16, 25 102:22 147:23 210:18	hope 17:5 109:4	
hiring 30:25	hit 43:8 55:21 56:2 60:18,20 139:12 140:6,10 141:24 177:24 191:21	hoping 16:17	
his 6:23 27:23 28:1 41:7,10,11,15 50:11 51:8 57:6, 18,23 60:8 63:15 64:15 67:11,21 71:24 72:18,19 74:19 79:15 82:7,8 88:14,20 93:8,14 96:3 98:9 101:18, 19 103:10 104:1, 16 105:10,22 106:22 108:3 112:5 115:25 116:23,25 120:20 121:24 122:1,3,7, 8,10,11,14,21,23 123:3,7,8,24 124:1,23 125:22, 23 126:7 133:14, 19,25 134:5,14 140:8,15 141:13 149:19 156:2,5	hit 43:8 55:21 56:2 60:18,20 139:12 140:6,10 141:24 177:24 191:21	horizontal 169:3 172:2	
	holding 140:3	horrible 211:20	house 24:3 39:14 52:9, 11,13 70:22,23,25 71:1,14 74:23 75:14 77:24 91:12 96:7 97:6,25 116:9 166:11 189:14 193:19,22 194:7 202:18,20 203:7, 10,11 224:3 245:3
	hold 20:8 63:21 88:18 97:3 108:18 177:16 178:11 180:22 191:1 225:17 239:24	Hoses 66:14	
	holder 238:15 240:21,23	hospital 108:22 109:1,6,11 122:2 130:12 154:6 227:18	
	Holy 108:25 109:6,11 111:5 130:11 154:6 226:25 227:20	hour 46:4 84:15 163:1 169:14,20 199:6 201:10,11 203:21 230:19,21 235:9	hosings 38:14,17 66:1
	home 9:8 35:4 36:21 54:17 57:5 61:13 95:16 96:18 97:15 115:25 118:15,22	hour-and-a-half 248:10	How's 168:22
		hourly 53:2,4 54:1,3,5 197:9 200:23 209:23	hug 41:17
		hours 57:15 60:23 93:12, 14,21,23,24 94:6 96:12 97:12,14 98:1,15,16 108:7,8	huge 130:20 186:18
			hugged 41:17
			hundred 209:15

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Hurricane 154:22	173:9 177:12 178:7,14 181:3,6,9 182:7,20 187:18, 24 192:8 193:21, 22 195:6 199:10 200:15 201:7,8,10 209:20 214:8 215:5 218:10 219:1 221:7 222:11 224:5 225:10 229:5,10 234:10,15 235:4 244:24 246:15 251:16	128:10,12,16 129:17	21,22,23 56:3,4,6, 15 57:13,15 58:5, 19 59:17,24 60:7, 8,11,19 61:1,10,16 63:9,14 64:6,14 66:17 67:21 68:8, 19,21,24 69:4,10, 20 70:3,6,16 71:12,22,23 73:14 74:1 76:12 77:2,3 79:10,12 80:21 82:6,10,14,15 83:8,16 84:8,17,20 85:2,24 87:4,17 89:14 90:3 91:6, 12,13 92:6,10,20, 22 93:18 94:12 96:2,3,7,9,24 97:1, 6,13,18,25 98:1,7, 14 99:5,13 100:22 103:22 104:12,25 105:2,11 108:5 109:10,18 110:15 111:9,12,14,16 113:7,13,14,24 114:11,13,15,19, 25 115:7 116:6,11, 12 117:8,12,16,18 118:12,13,15,17, 21 120:7,21,22 121:3,10 122:4,12 123:18,22 125:25 126:9,13,14,20,23, 24 127:2,17,20,24 128:1,2,9,23 129:18 130:8,9,20, 21 131:2,10,23 132:3,12,22 133:6, 25 134:3,4,16,25 135:1 136:4,7,11, 23 138:19 139:11 141:19 142:11,16, 17 143:16 144:1,3, 7,16 145:23 146:17,23 150:2 151:17,24 152:9	
I		idled 233:6		
I'D 69:15 127:22 137:24 157:1 190:3 243:3 248:1		images 148:3,10,20,25 149:13		
I'LL 6:6,16 86:15 111:25 135:2 146:18 152:18 161:12 172:23 206:8 214:19 217:2 223:13 224:9	I'VE 9:12 12:2,22,23,24 14:25 18:1,15,25 19:7 20:2 24:12 42:3,4,5,6,7 56:6 65:20 69:2 100:6 101:20 135:2 150:20 153:4 156:10 161:17 172:23 180:13 183:5 193:11 204:11 217:2 220:23 224:9	imagine 65:10		
I'M 5:8,9 8:10 10:1 11:25 12:2 13:17 14:11,20 16:17 17:22 19:13 20:21, 24 23:23 24:9 30:20,24 37:2,12, 23,24 38:4 39:18 43:12 44:5 45:2 47:4 50:8 54:12 57:25 65:4,10,20 68:18 71:2 72:7 73:21 76:7 79:16 81:12 82:24 85:13 92:4 94:17 101:11 103:17 109:3,15 111:19 113:11 116:18 117:1,16 120:24 121:2 122:20 123:7 129:5 134:2 137:22 138:1 141:16,18,23 146:6,11 149:23 164:4,9,11 165:2 166:13 169:15,23 170:2,9 171:5	idea 107:16 160:13 226:20 250:2,14, 24 251:18 253:9 254:2,14 255:9	immediately 178:15		
	identified 66:25 86:25 206:22 241:16 242:9	implemented 93:17		
	identify 205:7,9,17,22 206:15 208:25 215:17 242:8	impressed 50:20		
	identifying 204:25	in 5:4,12 6:3,6 9:2 10:12 11:4,5,23 12:11,12,13,14,17 13:8,15,25 14:3,6, 9,13,15,22 15:14 16:14 17:5,19 18:1,13 19:15 20:11 21:15 22:6, 22 23:4,24 24:5,9 25:25 26:19 27:19, 21 28:2,5,20,23 29:7,17,21 31:2,3, 19,24 32:4,15,21, 25 33:3,6 34:2,3,8, 11,20,24 35:25 36:1,2,3,12 37:19 38:25 39:13,21,22, 24 40:21 41:5 42:10,12 43:19 44:20 45:12,24 46:24 47:1,9 48:7, 9,15,17,25 49:4, 14,16,24 50:15 51:1,4,6,7,19,23 52:6,12,13,14,15, 16 53:7,9,11 54:13,16,20 55:16,		
	idle			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

154:13,16,19,21 155:5,7,10,15 156:3,5,7,19,22 157:10 158:3,16, 18 159:7,16,17,18, 20,22 160:4,7,10, 13,15 162:2,8,13, 18,25 163:2,13 164:13 165:12 166:2,7,8,10,15 168:3,24 169:3 170:24 171:23 172:13 173:11,16, 25 174:4,8,20,21, 25 175:13,16,22 176:9,18 177:25 178:1,3,4,6,21 179:18 180:14,17, 23 181:22 182:17 183:4,10,17 184:12,13 185:12, 24 186:22,23 187:22 188:1,17, 25 189:1,4 190:16 191:21 194:4,23 195:3,14 196:12 197:3,12 198:6,9, 14 200:4 201:12 202:11 203:16 204:6,24 205:1,11 206:1,14,25 207:10,14 208:9, 14,16,17 209:2,21 210:1 211:16 212:8,23 213:8,25 214:17,24 215:17 216:19,21 217:10, 22,25 219:1,2,8,9, 14 220:9 222:6,18, 19,21 223:7,21 224:24 225:1,14 226:10,11,15 227:2,23,24 229:1, 8,14,19,20,24 230:4,6,9 231:9,13 233:21,25 234:7,	11 235:12,21,23 236:1,21 237:1,2, 10,11,14,16,17,18 239:13 241:16,17, 19 242:6,9 243:3, 23 244:2,13 245:3, 10,12 246:4 248:15,19,24,25 249:9 251:14 252:5,12 257:7 inappropriate 33:13 105:13 inception 91:21 incessant 131:3 incident 33:15 140:14 include 70:11 189:25 214:25 included 70:14 151:2 155:18 183:24 including 10:8,11 94:10 123:17 126:19 160:2 188:7 208:15 income 242:9,13 incoming 74:11 130:2 incorrect 21:10 207:5 incredibly 175:13 incurred 69:2 222:7,18 independent	46:5 independently 248:1 India 57:16 66:17 97:18 98:7 189:9,10 indicate 207:11 indicated 7:13 34:11 103:9 135:21 212:12 220:8 239:18 indicates 223:23 244:3 indicating 145:7 individual 81:11 individuals 73:16 information 101:10,21 102:22 103:6,13,19,20 104:10 156:16 160:4 214:20 237:20 242:7 247:25 informed 108:3 informing 114:25 initial 206:1 initially 28:8 73:18 93:12 139:15 189:7 219:6 initiated 134:15	inlet 233:13 inpatient 111:8 input 35:25 64:14 94:6 inside 120:19 121:9 224:15 insist 34:4 Instagram 20:15 98:24 99:1,4 252:9 255:25 installed 151:7 167:6 instance 208:14 209:1 instances 64:17 105:9 instead 6:10 33:8,17,23 53:19 209:23 214:10 216:11 244:2 instruct 26:19,20 instructed 26:6 47:11 137:10 instructing 47:11 instruction 15:1 242:17 Instructor 11:19 13:1 insurance 67:23 68:1,5,9 69:6,13 78:19 227:8
--	---	---	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

intend 17:4	204:13 210:4 211:23 212:7 214:22 217:5 220:22 221:12 223:16 224:12 225:19,22 231:20 233:18 237:24 243:22	202:11 234:8,20	57:9,19 202:3
intercoastal 235:21		issued 15:4	its 70:3,5 131:10 257:17
interest 206:1 222:5 256:17		issues 60:9 138:15	itself 130:1
internal 129:3	inventory 33:5 34:19 38:16 39:3,4,6 40:10,18 128:22	it'd 91:15 188:20	IV 8:7
international 36:24 37:4		It'll 65:6,21	<hr/> J <hr/>
internet 109:22,24	investors 226:4	it's 6:13,17 7:5 9:23 15:12 16:9,24 17:20 18:6 19:22 20:9 21:3 36:21 38:22 42:8 69:5 101:7,18 102:11 106:6,10,14 110:24 112:5 113:4 116:17 122:12 129:25 130:1 141:20,21 144:23 146:5 147:1,10,16 148:23 166:6 168:11,14,25 169:17 171:8 172:9 173:9,10 175:6 197:14 201:9 207:20 213:22 215:4 223:19 227:22 228:6,10 232:23, 25 235:1 237:6,17 244:8 246:17 247:22 249:6 250:9,19,23,24	J-A-N-E 206:11
interrogatories 206:2 241:16 242:7	invoice 64:18,22 65:6		jailed 142:13
interrogatory 207:1 215:1	involuntary 110:13		Jane 136:23 137:8 205:9 206:10
interrupt 189:13	iphone 21:24		January 5:2,7 17:10 19:16 32:4 37:18 38:1 48:8 52:1,21 77:2 92:21 93:20 94:13, 19 127:10 136:23 176:25 177:3 207:3 239:24
interrupting 180:22	iphones 21:22		Jay 66:17 97:18
into 29:8 33:12 36:7 39:9,14,24 40:9 41:6 47:25 56:23 62:3,16 63:2 66:8, 10,14 72:2 83:23 84:1 86:13,18 87:15 89:4 94:6 100:1 106:1 117:10,12 122:16 127:15 128:3 133:17 134:5,10 135:5 138:4 140:9 146:21 150:24 152:21 153:7 154:14 161:19 170:17,24 173:1 179:15 193:6,10 203:6,17,22,25	island 42:14,16 83:12		Jessie 93:5
	Islands 33:9		job 50:11 123:13 125:16 128:24
	Isle 9:9 91:11 96:8 97:7		jobs 199:9 223:12
	Isles 196:7		John 66:2
	isn't 73:12 101:14 217:20 226:5 228:14 252:5	Italy 61:2 187:9	Johnson 10:24 11:1,4,5
	issuance 221:15	item 201:15,17	
	issue 30:18,24 84:11 130:24 201:3	items 24:3,6 35:12 38:10	

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Juan 154:17	57:23 58:19 59:5,7 60:23 62:14 64:25 66:25 72:4 80:25 81:21 83:20 86:7,8 90:8 92:21 93:11 97:4 107:2,3,4 115:16,21 117:16, 22 122:1,11 123:18 128:23 129:25 130:6 131:17 133:3 140:17 141:5,18 150:9 153:8 158:5 164:20 169:15,23 171:5 180:21 181:4,6 182:20 188:2 196:6 198:21 199:10 200:15,17 203:1 208:4 209:19,20, 24 211:24 215:18 220:8 224:5 225:21 227:10 229:3 230:4 234:10 235:12 236:18,20,21 237:2 244:24 245:25 247:8 248:7 251:4 254:15 255:21 257:10,16	134:3 180:22 209:20 221:3	100:21 107:5 113:18 117:9,11 119:9,21 122:10, 22 137:22 138:23 145:4,7 146:10 147:1,2,4,5,10,17 151:14 160:7 163:13 164:3,12 165:15 168:11,15 169:24 170:12,13, 14,22 171:6,9,12, 16,19,20,22 172:2, 3,11,21 173:12,15 183:19 184:18 186:16,17 187:2, 14 188:2 196:4,5 198:25 199:11,23 201:9,10 213:22 214:1 219:5 223:24 224:6,7,8 225:19 227:7 228:23 234:6,23, 24 242:4 244:3,17, 24,25 245:1 248:23 249:22 251:6,22 252:11, 13 253:12,22 254:6 255:13,20, 21 256:15
Judge 101:7,12 136:19 137:4 148:12 206:19	keeping 62:1		
Judge's 213:9	keeps 181:7		
judgment 148:17,22	kept 58:5 69:15 84:17 95:18 128:7 167:9 201:3 210:14,15		
July 39:21,22,25 132:5, 6 155:15,18 179:18	kicking 110:21		
jump 235:20,23	kids 82:1		
jumped 233:18	kind 9:22 20:4,11 33:20 79:17 89:10 95:21, 24 111:8 115:6,7 116:1 142:15 190:1 194:9 227:9 248:14		
June 23:11 61:18,22 79:1 82:20,23,25 83:7 84:4 85:10,13 90:4 94:11 103:21, 23 111:14 112:9, 13,15,21,22 126:14 133:10 142:17 155:17 159:18 163:13,20 168:24 169:4 170:3 172:7 218:5 227:1 237:9,12 240:1,14,20	kinds 54:17 71:19 256:10,13		
	knew 31:2 36:2,6 93:15 123:4,20 125:7 130:25 157:12 158:3,4 193:20 241:2 251:7 253:22,25 254:9, 17,23 255:2,4,6	knowing 104:18 209:11	
	know 6:6,15 12:2 13:4 14:25 20:20 26:4 27:3 33:24 34:11, 20 36:4 53:3,13, 15,17 54:11 57:15 58:17 59:5,8,13 65:15 69:14 80:11 81:13 86:19 87:13 89:5 90:8 91:3	knowledge 50:6,16 141:2 204:25 205:22	
Jury 236:25	K	known 7:19 254:7	
just 6:6,15 7:10 16:22 18:7 19:1,22,24,25 20:24 21:13 22:7 24:3 26:21,25 27:2 29:15 30:3 32:24 35:9 38:12 39:15 49:20 51:24 56:21	Kansas 10:20 11:5 32:9 83:2	knows 106:11 143:17 215:22	
	Karcher 224:21,23	Kristen 93:2	
	kayaks 48:14		
	keep 54:13,20 57:22 76:4,11 133:25		

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

L	169:5 178:1,3,10 207:18 217:7 220:6 230:18 239:25	lay 60:7	leaving 144:15
LA 41:25 42:2 43:17 44:23 45:5,15,25 46:2,20 47:17,21, 22 48:2,5 116:5,10 117:18,21 133:14 230:23 231:1,5,8 242:18	lasted 61:5	lead 41:11	led 149:19,24
Labor 132:11	late 16:13 176:11 225:14,24 230:17	leaf 199:16,17	left 32:20 34:12 38:25 41:15 52:10 53:9, 11,25 58:7 59:16 63:3 85:5,19 94:5, 12,17 95:6 125:8 129:9 144:1,2 150:7 154:12 156:7 178:5 180:21 189:11 219:3 227:2
Labs 41:9	later 43:9 47:25 58:2 126:18 127:18 176:6,7 180:16 183:11 187:7 218:25 219:23 233:23	leaking 234:21	leg 72:2 157:6,10,12, 15 158:3,11 226:25
lake 71:25 72:19,20,21 73:9,11,12,14 157:9	Lauderdale 9:9 41:19	leap 171:8,10	legal 122:24 124:7,12 144:11 149:2 163:16 170:17,19 206:15,16 213:11, 25 215:3 230:11 244:21 257:4
landlord 86:7	law 110:15 112:16 113:2 114:3 164:4 213:3	learned 104:22	length 73:22
landlord's 86:7	lawsuit 6:3 108:23 111:12, 14,16,18 112:1,5, 15 113:5,7,9,13, 14,24 161:22 162:2,13,18 163:11,24 164:15 168:4 172:14 176:2 202:11 205:1 213:4,6,8, 15,16,19,20 219:20,24 220:15, 16,25 241:18,20 244:8	lease 9:12 70:24 71:3,5 75:3 77:3,5,6,7,13, 16,21,25 88:18 225:4	lent 132:14,15,18,19
landscapers 199:16		leases 34:5 78:17,19 156:23	less 172:10 175:10,11 190:17,20 191:6, 14 201:12 220:11 235:6
languages 13:11		leasing 66:9	lesser 212:11
laptop 28:16		least 32:5 44:4,6 60:23 67:14 87:13 126:21 127:4,23 156:3 162:21 163:13 164:19 170:2 177:21,22 187:23 189:3,5,22 190:3	lessons 53:20,21,22
laptops 28:17		leave 63:14 85:6 125:11 133:16,17 143:22 175:3 176:4,11 180:2,7,12,13,19, 24 181:4,10,17,21 182:19,22 184:9	let's 20:20 21:18 23:11
larger 202:23	lawyer 137:21 138:8	leaves 155:6	
largest 175:16	lawyers 113:18 142:9,16 153:5,22 164:5,6,8 173:20 188:19		
last 8:11 16:8 19:13,14 22:4,20 36:11 37:8 52:13 55:23 72:10 163:5 168:3,8,9			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

29:17 32:1 39:13 52:12 61:18 95:11 120:12 126:14 176:1 188:23 197:1 231:21 236:18 241:15	line 33:18 80:9 169:5 195:16 230:8 257:11	193:4,18 194:12, 13 200:4,7,13,18 202:9,16 225:7 244:6,13	longer 48:13 52:7 58:8, 12,19 59:3,5 62:7 66:1 76:12,15 167:8 176:20 181:25 211:7 216:1 233:12 234:4 235:14 238:5 247:4,14
letter 137:14 138:10 141:8,25 142:9,15, 17 153:5,16,19,21 156:3 168:25 169:15 170:11	list 35:15,16,17,20 57:9 121:15 205:24 216:1	LLC 5:5 17:9 18:23 19:1 24:23 90:15 210:2	longest 198:23
license 11:10,12,14,18,19, 20,22 12:3,5,10, 14,18 13:1,14 14:9,13,14 15:4,8, 11,13,15 81:24,25 82:6,7 256:23	listed 71:2 247:3	loan 80:3	look 62:7,12,20 68:6 69:16 88:7 99:4 100:3 106:16 112:2 119:10 127:16 128:13 131:13 135:11 136:21 141:20,21 145:10 147:22 153:20 155:17 168:8 192:21 198:25 217:21 221:13 225:19 245:13 252:1
licensed 194:23	listen 64:14	loaner 133:8	looked 42:4 74:13 106:7 129:1,13 145:2,25 146:4 168:4 173:17 220:10,15
licenses 11:15,21 12:21 14:6,18 15:17	little 10:4 18:2,18,21 25:13 30:3 39:7 56:25 59:16 66:15 79:5 106:15,16 112:2 121:8 145:9 169:17,18,19 176:24 180:15,23 190:4 194:3 213:2	located 11:3 27:17	looking 33:17 56:10 57:6 63:18 97:21 98:18 119:19,21 129:24 143:3 151:3,11 154:12 169:4 171:24 204:5 225:25 226:12 242:6 246:21 247:5,7 249:13,17, 23 250:15 252:17, 21 253:9,12 254:1, 14,23,25 255:7,10 256:9,12,15 257:1
lie 214:13	live 9:14,16,24 10:2,8, 13 13:15 49:14,16, 24 51:2,15 202:15 203:12 204:2 244:16	location 36:22 42:3,5,9	
life 13:15 63:6 230:9 231:14	lived 10:5 47:24 49:19 51:12 52:8,9 77:24 114:24 194:15 202:20 205:15	locks 72:14 73:13,14	
Lifetime 41:25 43:16 46:22, 25 47:6,8,9,16	liver 19:8	log 117:10 221:12 237:24 239:13 245:10	
lift 102:25 103:1,10	living 13:16,18 47:21 49:4 69:20 70:15 75:5 76:25 77:15 78:7 89:10 91:11 97:25 100:22 143:13 165:3,5,11 166:14 167:12	logging 245:12	
light 104:12 105:11		login 101:10,14 159:8 237:19	
likely 217:7		long 9:11 10:2,7,12 31:21 38:13 49:7 59:24 60:2 72:10 76:25 79:4 83:3 85:14 98:11 108:25 113:2 176:21,22 187:13 211:8 221:23 230:18,22 234:11, 14 235:5,7 246:20, 25 248:9,11	
limitations 112:24			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

looks 192:23 193:1 222:20	143:20	228:10,14 229:21 247:21,22	94:10,12,14,19 95:2,3,5,11 102:19 104:12 114:11,13, 15 116:14,21 117:24 118:7,16 127:11 134:19 135:15,16 136:8 177:14,16 178:21 222:20,21,22 223:2 243:18
lose 22:25 23:3,6	M-O-U 9:21	makes 213:20	Marine 11:21 12:5 15:10, 16
lost 121:3	ma 238:14	making 56:7 68:12,15 72:15 78:19 121:6, 12,14 122:4 164:25 209:11,12, 17 212:24 223:5 232:19 248:15	mark 137:25 161:11 165:6 220:19 223:13
lot 27:25 36:19 38:23 56:11,20 66:16 71:20 74:15 98:8 141:14 166:6 176:6 177:8 181:13 187:3 190:9 204:7 211:20 228:23 243:12 245:19 246:11 247:20,24 248:3,5,13 250:14 255:23 256:3	machined 33:23	manage 124:22,25 126:5	marked 86:15 135:2 150:20,21 152:18 153:4 161:17 172:23 204:11 214:19 217:2 224:9
loud 6:10 39:17 63:16	machines 184:13	managed 154:8	market 250:3
lounge 180:16,17	made 19:2 20:14,20,23 21:11,15 29:24 61:15 69:25 70:13 80:24 87:24 99:9, 16,19 100:5 102:12,15 105:1, 10 106:1 130:13 139:15,18 158:2 160:3 201:3 211:6, 10,12 247:13 251:11	managing 34:22,23	marketed 18:3
loved 229:2	mail 23:25	manually 186:2	marketing 107:11
lucky 241:2	main 19:3,23,25 20:2,12	manufacturer 175:16	marketplace 24:7 152:9 247:11
lunch 94:17	maintain 101:22	many 43:15 45:25 49:9 66:12 92:24 95:12 96:12 97:11,14 98:1 115:2 186:9, 19 187:11,12,16, 18,22,24 189:11, 19 209:14 246:25 247:5	married 8:4 39:14 49:7
luxury 90:20 201:20	maintaining 119:19	Mar 60:20	master 245:2
M	make 6:25 38:15 53:18 57:8,9,21 69:6,24 71:18 74:10 91:22 123:18 133:19 138:8 146:19 150:7,15 175:1 181:6 183:21 186:3 187:7 194:9 199:3 200:19 204:7 211:24 212:4,19 223:2	March 29:5,7,18 32:11,21 34:11 35:7 37:19, 22 38:1 44:24 45:2,5,7,13,16 50:4 52:1,4,21 53:7,25 59:23 60:5,11 61:10 62:5 65:9 83:16 87:5	Mat 13:7
M-E-I-G-H-T 23:18			matter 5:4 32:3 122:13
M-I-L-A 9:21			
M-O-J-I			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

matters 213:25	146:16 148:2 149:21 150:2 151:19 152:7 154:17 156:20 157:19 158:8 160:3,9,19,23 163:2 168:14,17 173:19 178:9,11 180:22 181:4,9,17 183:21 186:6 187:13,16 188:1 189:10,15 194:19 195:12,24 196:22, 23 198:16 199:21 200:22,23 201:2 202:7 206:21 207:4,14 208:3,4, 19 211:19,21 212:10 213:3 217:1,8 220:4 222:19 225:9 239:15,24 246:3 249:19 251:15,21 254:12,13	227:15 228:22 232:1 245:21,25 246:20,24 247:8 248:4,22 249:21 250:1,9 251:4 252:17 253:18 254:13 255:24 256:3	meet 37:4 174:25
Maxum 9:23			meeting 116:24
may 6:4,22 7:4 20:6 94:11 130:13 155:7 191:8 222:4 254:7			meetings 33:25
maybe 19:7 26:21 45:4 58:17 62:15 130:21 209:15 222:16 232:25		meaning 9:16 13:9 15:2 19:14 89:7 102:19 213:6	meight 23:18
me 6:6,15 7:10,24 12:8 14:1,2 21:9, 12 26:6,20 34:21 35:15,24 37:2 39:5 42:25 43:1,16 44:7 45:23 47:16 48:9 52:12 53:17 54:10, 16 55:19 56:2,10 57:7 59:5 63:13,21 65:17,21 66:6,10 67:16 72:8 74:2 77:7,12,15 79:19 81:2 83:9,10 84:6, 11,17,25 85:6,15 86:11 90:11 91:7,8 94:25 95:25 96:1 100:15 101:19 102:1,13 104:15 106:9 108:10 110:12,20 112:15 114:8,9 115:5 116:4,8,22 117:4 118:20 119:7 120:1 121:3 122:1 124:19 126:3,8 138:11 139:14,23 140:8,16,20 141:4, 17 142:13,20,25 143:10 144:18	meal 73:19,25 225:12	means 92:15 183:2 191:5 202:16 228:3 238:15 243:6	Melinda 5:1,4,17,21 7:14, 22 23:17 24:10
	mean 9:5 17:25 18:5,14 26:22 32:22 33:1 34:10 35:13,20 36:10,23 37:2 44:16 60:14 66:17 80:6 85:21 106:3, 12 110:24 115:13 119:25 123:16 125:20 137:17 142:23 149:5 157:4 166:4 167:17 174:25 175:13,18 177:14 196:21 197:17 200:17 210:11 211:24 212:2 214:8 215:20 225:11,21 226:5	media 18:8 20:19,23 21:7 27:2 35:2,4 56:10 57:7 97:21,22 98:11,12,15,17,20 105:5,11 107:21 119:10 198:2 233:24 245:7,8 246:14,16 249:14 250:2,15 251:8,15, 17,19 252:3,5,10, 11,22 253:1,23,25 254:11,18 255:2,5, 7,14 257:2	members 50:23
		mediation 241:21	Memorial 132:10
		medical 8:14 102:22 103:10,20 227:1 228:15	memory 8:15 184:25
		medication 122:11 134:4	mental 228:20
		medications 8:15 122:1,7,10,14 123:3,12 126:7 133:24,25	mentioned 12:20 47:10 51:11 67:4 82:18 84:23 107:2
			mess 69:5 123:5
			message 129:22 137:15 138:11 160:22 217:1
			messages 23:1,4,6 91:3 129:21 141:11,12, 14,17 203:24 216:24 230:7
			Messenger 119:20
			met 24:5 41:5,6 48:17, 24 114:8 205:11 219:1 241:24

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Mexico 53:23	68:4,12,14,17,21 69:9,21 70:4,7 71:4,7,12,14 72:7 74:7,9 75:1,12,22 76:12,15,17,20,25 77:8,18 78:20,24 79:14,16,19 80:15 81:4,16 82:5,8,11, 20 83:5,7,23 84:4, 6,16,19,23 85:2, 17,24 88:15,19,22 89:3,7,11,21 90:1, 3,10,19 91:3,18 93:3 94:17 95:12 96:24 97:7 98:2,10 99:22 100:22 101:1,9 102:1,4,13 103:15 104:1,11 105:10,24 106:8, 24 107:24 108:10, 12 109:14,16,17, 21,25 110:5,11,19, 20,21,24 112:5 114:16 115:8,10, 19,20,22,23,24 116:4,16,19,22 117:1,15,17 118:7, 14,17 119:25 120:1,3,5,13,16 121:15,19,23 122:1,2 124:20 125:2,18,19 126:2 128:7 129:9 130:14,18,25 131:16 132:12,20, 22 133:13,20,25 134:15,23 135:18 136:15 137:14 138:14,17 139:6,8, 12,14,18,22 140:2, 5,12,15,17,23 141:1,13 142:1,5, 10 143:3,24 148:1, 3,5,10,20,25 149:13,16,19,24 150:4 155:10	156:2 157:10 159:22 160:10,19, 22 162:15 165:3,6, 7 166:11,12,14,18 167:8,14,21,23 175:15 176:23,25 177:2,21 180:1,16 182:10,16 183:7,8, 10,21 184:12,15, 16 185:12,24 186:1,11 188:9 189:1,9,16 191:21 193:3,14,16 194:6, 8,12,22 195:11,14, 22,24 196:22,24 197:1,12 199:16 200:2,14 201:9,18, 19,22 202:4,5,9 203:12 204:5 208:9 209:8,13,16 211:10,12,24 212:4,16,19 213:2, 6 214:2,4,10,12 216:1,8,10,14,18, 19,25 218:4,12,15, 19,22,23 219:12, 24 220:1 223:11 224:2 225:3,13 226:6,14,18 227:2, 4,11 228:22 229:13,19,20,24 230:9,14,16 231:16 232:15,16 233:16 234:8,20 237:18 238:10,17, 20 239:2,10,11,12 240:3,5,7,23 244:7,8,18 249:17 250:13,24 251:14, 18 252:10,25 253:3,6,12,15,19 254:9,17,23 255:2, 3,9,20	55:22 74:12,18,19 75:9 101:7,18 102:22,25 103:5,9, 20 115:4 122:6 125:24 131:13 133:24 134:8 138:18 156:7 159:2 166:24 177:18 178:23 197:18,19 201:19 228:20 229:3 230:1 231:21,22 237:11 253:21
Miami 42:8,9		mike85233@ gmail.com. 25:12	
Michael 5:5 49:13 135:11 154:15		Mila 9:19,20,21 47:24 62:3 74:22	
Michaels 5:1,4,17,21 7:13, 14 105:20		million 55:25 143:16 178:2,6	
mid-march 58:23 60:20 121:1		Mills 42:6	
middle 7:14 45:6 73:14 177:16 178:21		mind 229:1 231:13	
midnight 183:2		Mindy 23:16,21,25 24:2, 10 105:20	
might 27:18 56:23 64:24 88:7 105:21 123:11 126:22 133:2 174:21 184:5 248:16,17		mindytubb@ gmail 23:16	
Mike 24:5 26:6,18,19,20 27:3 28:5,12 29:8 30:1,11,14,15 31:2,8 32:25 34:1, 2,4 35:14,19,22 38:11,18,23 40:7, 14 41:1,2,5,6,8 42:25 43:10 45:23 47:21,24 48:24 50:19 51:2,15 53:9,11,15,17 54:6,8 55:11 56:13 57:5,15,17,22 58:6,20 59:15,18 60:7 61:12,15 62:23 63:1,8,10 64:15,23,25 66:14, 25 67:4,16,23	Mike's 26:7,9,13,16 34:6	mindytubbert@ gmail 23:15	
		minimum 162:4,8,12,14,21, 22 164:19,20 168:5,10,18 169:10 172:5,14, 15 197:3	

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

minute 27:5 32:15 50:1 65:21 144:18 251:2 252:23	22 128:17 129:15 173:24 174:9 180:20,24 181:12 182:20,24 187:25	221:25 222:2	16 193:19 202:22 240:19
minutes 198:24 199:5 230:24 232:22,25 233:13 234:2,4,14 235:4,6,18 236:11 248:9 249:11 251:5	money 57:22 83:23 84:1, 14 88:4,5,23 111:12 112:20 114:1 123:22 142:7,17 143:2,9, 10 160:16,19 165:17 167:9 190:25 193:3,6 194:9 202:9 207:12,13,18,25 208:1 209:10,18 214:2,9,11 216:4 218:4 223:6,8 226:7	more 33:10 35:4 40:10, 11,18,19 58:8 61:15 72:13 111:15 163:11,23 164:14 170:25 173:9 176:17 177:8,24 190:7,14, 19,21,24 191:1,5, 10,11,12 192:4,9, 10,11,19,20 203:11 205:25 206:3 215:18,25 248:3,5	moved 27:21 28:8,15,23 29:4 39:9,14 40:3, 4,9,16 47:25 50:19,20 51:19 52:5,8,9,14,17 54:8,17 61:24 62:3 70:15 75:4 77:18 86:12 91:15 94:2 166:19 182:24 194:2,4 203:4,6,25 240:17
misdemeanor 138:20,22 139:2,3 140:21 206:22 215:12,14		morning 5:3 6:1 39:3 56:4,7 60:12 114:19 118:5 130:21 176:9 242:23	moving 39:24 41:21 72:4 202:23 217:25 225:21
misdemeanors 138:25			MRI 14:6
misrun 203:23	month 38:11 44:6 69:14, 18 77:22 78:8,25 84:19 85:2,11 92:4 106:9 107:9 134:18 135:7 166:8 202:25 203:1 211:13,22 212:12,15,16 222:6 242:11	mornings 44:16 45:19 53:19 116:11	much 27:3 36:25 43:9 59:3,4,17 60:18 69:9,13 77:21,25 78:7 84:12 118:24 120:18,19 123:22 126:2 128:11,15, 16 129:14,17 130:5 160:21 162:25 172:13 176:7,20 184:16 186:16 188:13 191:15 202:9,13 211:7 222:15 223:9 232:1 233:12 234:15 247:14 251:18 254:2,3,5,9 255:10,13
missed 32:12 46:1 50:8 93:7 126:6 161:12 186:5 190:4	monthly 70:12 77:25	most 63:5 64:13 112:17 173:23 189:7 244:12	
Missouri 11:6	months 10:4,7,8,11 37:8 40:14 52:10 55:23 61:6,9 67:7,15,18, 19 68:25 76:23 77:9,11,12,14 127:12 132:19,23, 25 167:13 173:11 176:19 177:22,25 178:1,6 181:21 182:13,23 185:21 186:18,21 193:12 211:4 219:4,23,25	motor 66:10	
misspoke 45:4		motors 57:20,22 66:12 103:2	
misstated 201:1		Mou 9:19,21	
mistake 98:6		mounted 233:9	
mistaken 14:11 219:1		mouth 18:7 93:13	
module 117:10		move 31:3 41:6 51:18 62:2 77:16 179:15,	multiple 12:25 37:21 133:4 138:24 177:4 199:14 201:1,3 234:13
Moji 143:18,19			
Monday 53:19 60:13,14,15, 21 126:20 127:19,			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Murray 7:22	15 158:3,24 159:11,16 160:2,3, 4 162:17 164:5 165:18 166:21 170:12 177:7 178:11,15 182:5 183:17 186:19 189:15,18 190:10, 13 192:7 193:11 195:14 197:24,25 200:23 201:2 202:2 206:17,21 207:2 209:3,18 210:1,3 211:20 212:6,9,11 213:3, 7,20,21 214:7,13 215:15 223:19 226:22 229:5,10 230:6 235:2 237:17,20,22 238:4,25 240:3,7 241:3,19,24 245:2, 10,17,19 246:13, 16 247:20,21,25 249:5,16 250:22 251:13 252:1 253:13 254:13 255:1	13,19,20 67:11 68:19 77:3 82:8 93:9 99:22 105:15, 19 107:4,16,17,18, 20 119:22,24 210:1 237:10,11, 14,16,17,19 238:12,14 251:13	33:14 35:24 97:4 106:16 195:11,12 235:15 256:3
must 201:9		needed 36:6 38:15 43:1 57:7,9,19 72:13 74:11 126:4 154:21 158:3 194:19,20 196:3 202:15 234:9	
my 5:8,10 6:1,4,5 7:10 9:6 11:18,19,20, 21,22 12:19 13:7, 15 18:1 19:3,8 20:2,5 23:5,6,23, 24 25:22 26:5 29:25 30:1,16,21 34:15,18 35:25 37:5,8 38:16,25 39:2 40:23 41:14, 20 42:8 44:2 45:10,14 48:23 54:17 55:9 56:9 62:2,11 63:3,10, 12,21 64:9 65:13 67:3,9,14 68:2 69:25 71:20,23 72:1,2 77:3 82:21 84:2,21 85:6,16,20 86:2,6,12 88:13 93:5 96:3 99:16, 21,23 100:1,8 101:21 103:17 104:17,21 105:14, 18,19,20,24 108:1, 3 110:11,12 113:14 117:22 118:13 120:8,9,25 122:18 124:20 125:16,19,20 129:1,19,22,23 131:7 132:23,24 133:2 134:9,13 138:9,18,19 140:16,18 142:14, 24,25 143:16,24 146:11,16 149:17 150:3 151:4,8,17, 19,22 154:18 156:7 157:6,10,12,	named 18:15 93:3		
	names 5:14 7:19,21 49:11 98:21 215:22 242:4	negative 102:3,5,8,9 104:11 251:11	
	nap 60:8 97:16 98:3 115:25	neighbor 31:19 104:22	
	narrow 11:23	neighbors 241:19	
	Natalie 65:1	nest 28:11,13,15 160:1	
	national 36:25	never 16:24 32:7 34:6 69:3 84:2,10,11,14 89:24 90:18 100:15 103:13 104:4,7 139:9,17 140:4 150:5,6 162:11 165:6 167:21 170:20 193:19 197:25 200:23 201:2,22 202:17 207:9,16 208:3,4 220:13,18, 23 225:11 226:22 251:14	
	nationally 5:9		
	nature 80:25 229:2	new 22:7 40:10 45:10 54:7 61:25 86:7 98:19 131:25 132:1,2,3 240:8	
	navigate 81:15,17	next 36:1,16 39:1 57:8 67:16 120:16	
	Navy 167:24 218:16,20, 24 219:6,13,15,16, 18		
	nearly 154:24 244:9		
	necessarily 20:7 64:13 99:15 246:23 249:22		
	need 6:15,18 19:17 20:8		
	N		
	NA 220:20		
	name 5:8 6:1 7:14,15 9:18 26:3,5,7,9,13, 17 42:8,11 63:23 64:9,11,21 65:6,7,		

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

171:11 178:23 183:23 184:20,21 207:15 229:7 232:2 254:12,13	nipples 65:25	163:21 165:8,18, 23 166:16 167:8 168:1,13,16 169:2, 23 171:7,21 173:11 174:3,12 176:6,20 177:19 178:18 180:10 185:3 190:2,18 191:18 193:8 194:3,11,22 196:8, 21 197:22 198:14 200:2,8 202:7,14 203:10 204:3 205:8,13 207:6 208:11 211:4 212:2,3,18 213:2, 13,21,24 215:4,7 216:23 217:9,20 218:1 220:4,16,18 221:6,8 222:8 223:4 224:1,4 226:20 230:6 232:4 233:2 235:22 236:7 237:11,15 238:5, 19,22 240:23 241:21 242:20 245:2 246:13 248:3,21 249:4 250:2,14,24 251:18 252:23 253:3,8 254:2,14 255:9 257:7	nonstop 130:15
nice 213:2	no 5:12 8:3,17 9:15 11:9,11 13:12 15:12 16:21 17:20 18:4,6,17 19:22 20:13 21:2,8,23,25 24:24 25:5 28:14 31:10 33:7 35:18 37:10,12 38:8 42:22 43:6 44:18, 25 46:23 47:7,13, 19 48:13,16 49:17 50:25 51:10,13,17, 20 52:7 54:23 55:3 61:8,14,23 63:22 66:1 67:9 68:13, 14,23 69:8 70:17, 21 72:23 73:13 75:18,23 76:12,15, 19,24 77:6 83:8,24 84:2 85:12,23 86:1 88:2,21 90:10,23 91:7 93:12,22,24 95:10 96:20,23 98:5 100:6,15 101:25 102:7 106:8,14,22 107:24 109:9,24 110:3,17 111:2,7, 10,17 115:21 117:20 118:2 119:13 120:3,24 121:19 124:9 125:16 126:11 128:11 129:3,8 131:18,24 134:9, 20 138:1,7 139:23 140:4,13 141:10 144:9 148:8 151:12 153:19 155:1,2 157:24 158:18 159:24 161:12 162:9	nor 90:18 165:7	normal 62:14
nicer 203:9			normally 28:3 65:12 184:12
Nicholas 49:13			northern 42:8
nickel-plated 66:5			not 6:13 7:5 10:1 11:9, 11 12:18 16:25 17:18,20 18:4,5 19:13 20:9 21:17 23:2 25:2 26:15 27:18 29:22,25 30:14,16,20,22 31:10,14,18 32:8 33:4,24 43:9 44:5 45:7,8,9 49:17 53:15 54:12,14,16, 24,25 55:5,6 56:23 60:6 63:2,20 64:5, 13 65:10,13 68:18 72:7,25 73:6,21 81:12 85:3,9,21,23 86:2,20 90:15,16 91:9 92:4 96:5,16 97:8 99:12,15 102:18,25 103:7, 10,16,17 106:6,8, 14 108:4 109:3 110:23,24 111:7, 12,19 112:1 113:8 114:13 116:4,8,17, 22 118:20,23 119:5,13 120:3 121:10,19 122:8,9 123:3 124:15 125:6 126:23 128:15 129:25 130:20 131:18 132:11 137:14,16,
niece 30:4 96:3 104:17 105:14,21,24 120:8,9 138:18 140:18 154:18 245:2			
niece's 104:21			
night 35:4 44:10,12 60:12 96:19 98:16 114:23 115:17,20 117:23 122:3 126:17 131:23 155:25 176:5 180:2 187:7 230:17 249:23 250:25 251:7 252:22 253:1 254:22 255:7,14			
nightly 250:11 254:2,10			
nights 45:20 72:11,18,24 83:4 109:2,3,6,11 115:2 116:18,20 117:25 118:9 126:18 128:6 176:8,11 181:14			
		nobody 98:21 119:23	
		nod 6:10	
		nodded 6:12	
		noise 28:11 133:18	
		none 229:18 239:1,18, 25	

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

17,22 138:1,7,10, 17 139:8,20 140:5, 11 141:8 142:3 143:6,16 144:10, 16,23 145:3,4,5 146:25 147:10,12, 16 148:16,22 149:17,23 150:8 151:14 155:7,12 159:1,24 160:14 161:25 162:3 163:14,19 164:4, 11,22 165:2 167:10,15 168:22 171:1 172:22 174:1,3 175:8 178:6 184:8 185:9, 15,25 187:15 190:3,10 191:6 192:7 193:21,22 194:11,14,15 195:6 198:25 199:8,20 200:14, 16,19 201:11 204:22 205:14,17 207:4 209:12,20 210:1,8,21 211:11, 17 212:14 213:2,9, 20,24 214:13 215:4 217:7,9 218:10,14,25 219:25 220:16 223:19 225:10 228:6,21,24 229:3, 5,10,19 231:11 232:1,23 235:20 237:6,18,25 238:17 239:11 242:20 246:17,23 247:3 248:21 249:4,5,6 250:9 251:4,14,16 252:23 254:6,7 256:11	57:8 79:19,20 212:3 noted 104:14 notes 137:20 138:2,7 160:11 183:22 nothing 63:1 90:9,24 91:6 102:1 106:11 125:7 150:19 193:23 196:19 197:19 notice 35:23 notification 220:5 notified 220:13 notorious 33:20 November 37:9,14 49:25 74:1 126:13 now 14:1 15:22 24:11 45:8 55:18 80:22 82:1 98:9 116:13 117:21 140:9 162:10 208:19 233:8 235:11 237:14 239:5,11 240:5,6 250:20 number 5:6,10 8:11 15:21, 23 16:1,5,10,12, 16,19 17:4 21:19, 20 27:10 65:12 74:14,17 86:25 106:17,18,19 129:8,9,10,14,15	146:13,18 162:3 168:11 177:24 188:2 204:24 206:14 207:1,10, 22 208:8,17 209:2, 4 215:1,2,16 224:10 239:21 240:17 241:2 242:8 numbered 150:21 numbers 15:21 16:14 107:7, 21 129:7 168:15 171:23 nurse 227:24 nuts 180:23 <hr/> O <hr/> o'clock 34:8 117:20,22 130:21 131:22,23 176:5,9 180:2 183:14 Oakland 42:5 oath 8:18,24 9:1 173:22 object 6:22 7:1 228:12 objection 104:14 105:6 111:1 118:25 122:24 123:9 124:7,12 125:3,13 144:11 149:2,9 150:12 163:16,25 170:6 171:14 191:16,24 192:25	193:24 194:25 195:5 210:22 213:11 230:11 236:14 244:21 249:1 250:5,17 252:19 253:11 254:20 255:15 256:1,5 257:4 objections 6:23 objects 7:1 obnoxious 80:12 81:3 obtain 12:10 13:13 15:13 obtained 12:11 occasion 226:6 occasional 176:10 occasions 32:25 53:18 71:19 208:20 occupied 40:1 occur 227:14 occurred 20:25 61:7 ocean 76:6,8 231:25 235:17,23 236:25 Oceanside 233:7 October 49:25 126:13 off
--	--	---	--

note

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

24:6,7 25:13 42:3, 13,25 43:11 46:16 62:3 63:14 68:14, 17,21 69:9,10 77:13 78:10,12,20 91:11 92:6 99:23 107:6 109:5 113:22 117:22 127:21 131:2,12, 17,19 132:7 161:7 193:20 198:16 203:6 230:14,16 231:16,19 241:11	92:19 227:14,15 252:7 253:12 oh 12:12 16:5 33:14 39:18 42:3 101:1 137:22 139:11 151:12 200:25 215:7 oil 69:4 okay 6:13 7:4 8:8,14 12:1,15 13:6 14:8, 12,18,24 15:10 16:8,19 17:12 19:5,20 20:8 21:3, 9,18 22:15 23:11 25:20,23 26:12 27:16 28:2,18 29:6,17 30:22 31:5,8,12,16 32:18 35:19 36:9,15,23 37:11,17,23,25 38:3,21 39:24 40:16 42:2,23 43:3,7,10,25 44:15,19,22 45:1, 12,14,22 46:15,20 48:2,11,20 49:20 50:22 51:11 52:4, 11,19 53:3,6 56:1, 15 57:10 58:10,13, 22 59:2,11,21 60:1,10 61:5,18,21 62:18 63:18 64:7, 20 68:4 69:20 70:19 73:1,4,8 74:21 75:9 76:9,20 77:4,7,14,21 78:23 79:4,9,16,22 80:10 81:1 83:22 84:7,23 85:1,4,8,14,24 86:22 87:3,8,11, 13,18,21,25 88:3 89:1,7,25 90:7,22	94:19,25 95:5,8, 11,17,21 96:4,17, 20 97:11 98:1,10 99:4,11 101:9 102:3 103:5,9 104:6,9,14,20 105:4,16 106:17, 20 108:9 109:10, 17 110:13,18 111:19,21 112:11, 14,25 113:12,21 114:7,10,14 115:2, 13,19,24 116:10, 13 117:1,6 118:7, 19 120:5,12 121:2, 17,21,25 123:6,24 124:5,11 125:9,17 126:12 127:5,15, 19 128:20 129:13 130:5,8 131:7,16 132:17 133:5,12, 20 134:10 135:14, 17 136:6,18 137:7, 18 138:16 139:3, 16,21 140:21 141:12,16 142:4, 21 143:1,4,12,14, 22 147:12,15,22 148:9,14,23 149:11,18 150:18 151:2 152:1,11,18 153:4,20 154:8,11, 23 155:7,9,14,19, 22 156:2,9,14,17, 21 157:20 158:13 159:1,6,12,19 160:8,15 161:3,15, 24 162:12,17,22 163:9,22 164:18, 23 165:9,14,20,24 166:10,20 167:5, 12,20 168:3,21,23 169:4,13,21 170:15,18 171:18, 22 172:8,20 173:7, 14 174:2,5,16,25	175:5,10,25 176:7 177:2,20,23 178:7, 19 179:1,3,6,8,12 180:5,9,11,19 181:20 182:1,9,16, 19 183:1,9,16 184:2,7 185:11,14 186:12 187:3 188:6,13,22 189:25 190:16,19 191:12,20 192:11, 14 193:3,9,16 194:6 195:8,11 196:9,18,24 197:6, 11,23 198:4,12,17 199:1,5,10,22 200:2 202:8,19 203:20 204:24 205:7,9,12,25 206:4 207:7,10,15 208:6,7,24 209:19, 22 210:8,15 211:9, 15,22 212:2 214:14 215:6,12, 16,20 216:2,10,20 217:2,12,25 218:11,15,21 221:15,22 222:9, 15,25 223:1,20 224:9,17 225:3,6 226:2,11,14,18,21 228:3,18,22 230:16 231:18 232:5,18 233:12, 14,19,25 234:24 235:3,10,13 236:3, 8,24 237:5,14,18, 22 238:2 239:5,6, 17 240:10,25 241:4,6,9 242:13, 22 243:5,16 244:1, 6,15,17 245:12 248:2,4 249:17 250:1,9,13 251:25 252:8,24 253:18 254:8,17 256:9,12,
offer 208:25 offered 21:6 offering 20:15 offers 20:18,23 21:11,14 offhand 14:21 office 27:21,22 117:8 157:18 158:1,10, 15,16,17 203:17 227:23 228:8 243:22,23 244:10 officer 149:19,25 150:14 officers 140:6 offices 227:21 official 12:18 106:22 officially 18:4,5 often 43:16 53:23 67:13			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>25 257:10,14</p> <p>Okeechobee</p> <p>71:25 72:19,20,21</p> <p>73:9,11,12 108:18</p> <p>157:9 183:25</p> <p>old</p> <p>38:14</p> <p>on</p> <p>5:3 6:17 8:11,21</p> <p>9:5,16 12:8 13:15,</p> <p>16,18 16:24 17:10,</p> <p>14 18:8,9,11,16,</p> <p>19,22,23,25 19:2,</p> <p>3,5,6,8,11,16,23,</p> <p>24 20:8,12,14,19,</p> <p>23 21:6 23:22 24:1</p> <p>25:22 26:17 27:1,</p> <p>8,23 28:7 31:16,</p> <p>17,18,20 32:14,25</p> <p>33:15 34:1,20</p> <p>35:23 36:5 38:16</p> <p>44:8,9 45:18</p> <p>47:24,25 51:4 52:2</p> <p>53:19 54:7 55:24,</p> <p>25 56:9,10,23</p> <p>57:3,5,6,18,22</p> <p>58:10 60:19,24</p> <p>62:9 63:8,21,23,24</p> <p>64:14,15,21 65:6,7</p> <p>68:2,13 69:20</p> <p>70:7,15,24 72:12,</p> <p>13,15,18,22 73:4,</p> <p>7,16 74:18,20</p> <p>75:3,5 76:6,8 77:5,</p> <p>6 78:7,22,23,24</p> <p>79:2,6,15,17,20</p> <p>80:5,15,20 82:19</p> <p>86:6 87:8,15,24</p> <p>88:13 90:15 91:8</p> <p>92:17 93:6,14</p> <p>94:16 96:7 97:3,</p> <p>18,20 98:9,11,12,</p> <p>14,15,16,23 99:6,</p> <p>9,19 100:6,7,13</p> <p>101:8 102:3,12,15,</p>	<p>21 103:11,20</p> <p>104:4,9,21 105:1,</p> <p>4,11,17 106:1,2,3,</p> <p>16,17 107:16</p> <p>108:18 112:8</p> <p>114:25 115:6</p> <p>116:21,25 117:13,</p> <p>25 118:2,6,8,16</p> <p>119:12,17,18,20</p> <p>121:15 122:4,5,18</p> <p>126:10 127:2,20</p> <p>128:18 129:14,18,</p> <p>20,22,23 130:5</p> <p>131:1,13,14</p> <p>133:10,14 135:21,</p> <p>25 136:2,8 137:18,</p> <p>19 138:7,18 139:7,</p> <p>8 140:8,15,19</p> <p>141:15,18 142:6</p> <p>143:13 144:17,18,</p> <p>21 145:11,16,18</p> <p>146:6,24 148:4,6,</p> <p>18,21,25 149:12,</p> <p>16 150:4 151:7,11,</p> <p>20,22 152:1,3,8,</p> <p>10,15 155:10,21,</p> <p>24 156:25 157:11</p> <p>158:17,19,20,23,</p> <p>24,25 159:1</p> <p>161:10 162:14,16</p> <p>163:1 165:22</p> <p>166:1,5,19,25</p> <p>167:6,13 168:8</p> <p>170:11 172:10,22</p> <p>173:20 174:6,17,</p> <p>18,24 176:1</p> <p>177:16 178:11</p> <p>180:8,11,19,22,24</p> <p>181:8,12,25 182:5,</p> <p>8,12 183:3,7</p> <p>184:5,12,25</p> <p>185:16,20,22,25</p> <p>186:7,8,21,24</p> <p>187:7,13,17,19,21,</p> <p>25 188:9,13,14,16,</p> <p>18 189:9,10,18,19,</p>	<p>20 190:2 191:1,13,</p> <p>14,19 192:2</p> <p>194:20 195:15,23,</p> <p>24 196:4,8 197:13,</p> <p>24 198:1,2,16,18</p> <p>200:16,19,22</p> <p>202:4,5,13 203:13</p> <p>204:4,9,22 206:22</p> <p>208:20 209:3</p> <p>210:1,21 213:4</p> <p>215:2 218:8</p> <p>219:17 221:13,20</p> <p>222:3,4 223:1</p> <p>224:4 225:17</p> <p>226:19 227:25</p> <p>228:19 229:20</p> <p>230:1 231:15,22</p> <p>232:2,8,12,15</p> <p>233:9,10,18,22,23,</p> <p>24 234:11,22,23</p> <p>235:1,5 237:20,25</p> <p>238:17 239:7,22,</p> <p>24 245:6,8 246:13,</p> <p>16 247:3,8 249:14,</p> <p>22 250:11,15,25</p> <p>251:6,11,15,17,19</p> <p>252:11,12,22</p> <p>253:1,4,21,23,25</p> <p>254:2,10,11,13,15,</p> <p>18 255:2,4,10,11,</p> <p>14,22,25 256:8,9,</p> <p>12</p> <p>once</p> <p>41:19 60:4,20</p> <p>64:23 121:8</p> <p>126:12 127:15</p> <p>145:13 171:2</p> <p>176:23 177:24</p> <p>190:6,12,13 191:2,</p> <p>10,20 195:23</p> <p>199:12,14 203:16</p> <p>208:8,9 232:9</p> <p>one</p> <p>7:6,9 9:15 13:5</p> <p>20:4,5,8 24:24</p>	<p>27:19 28:4,5,6,9,</p> <p>13,14,22 33:4,19</p> <p>35:5 37:5 39:4</p> <p>40:7 52:1 54:11</p> <p>61:2 62:19 65:16</p> <p>70:4 75:6 77:5</p> <p>81:16,23 82:18</p> <p>83:8 91:7 107:5</p> <p>111:15 121:24</p> <p>122:9 126:21,22</p> <p>127:20 129:8</p> <p>130:23 131:4</p> <p>132:22,23 133:4</p> <p>137:7 139:1 142:3</p> <p>144:2,15 149:21</p> <p>152:12,14,24</p> <p>153:14 165:10</p> <p>169:3,25 171:10</p> <p>172:1,2 177:25</p> <p>180:15 189:5,20</p> <p>190:4 193:17</p> <p>195:15 198:12,14</p> <p>199:20 201:20</p> <p>204:1,4 208:12,17</p> <p>212:25 214:24</p> <p>215:17,22 222:23</p> <p>226:10 227:3,19,</p> <p>20 228:10,14</p> <p>229:2 230:19,21</p> <p>232:14 233:9,10,</p> <p>12,24 234:2,17</p> <p>235:3,6 237:21</p> <p>238:3 239:5,8</p> <p>243:15 247:10</p> <p>ones</p> <p>242:18,23</p> <p>online</p> <p>23:8 36:2 53:16</p> <p>64:14,16 66:16</p> <p>81:25 103:25</p> <p>151:21 183:20</p> <p>185:16,17,20,22</p> <p>186:1,2 213:10</p> <p>221:9 253:9</p>
--	---	--	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

only 7:9 8:11 18:2,25 21:14 22:10 31:18 37:5,20 43:4,5,18 44:22,23 45:5 54:16 60:16 61:11 64:5 76:22 77:3,4, 8,11 93:3 109:18 110:1 120:16 128:6 129:8 132:7 133:2 138:17 139:1 152:12 155:6 175:21 189:1 195:2,3 198:12 199:7,12 205:11,14 207:1 208:9,12,22 217:16 222:4 231:13 238:23 239:5,8,15 242:9 246:13,16	Operator's 11:21 opportunity 90:20 opposed 15:19 optimize 233:17 option 100:15,16,24 119:4 order 18:1 20:11 36:3,7 64:11,12,16 65:5, 12 66:12 101:7 109:18 127:25 134:16,22 135:18, 20 136:1,8,10 141:7 142:4 144:8, 17 146:12 148:2,6, 11,20,24 149:11 184:22 185:7,9,16, 17,20,21,22 186:1, 2,3 211:5 213:21, 24 215:15 223:7 241:21 ordered 184:24 187:3 189:8 ordering 65:1,2,4 66:15 orders 36:2 44:8 51:24 52:20 57:23 59:24 64:10,13,20,23 65:2,8,14 117:11 136:22 183:19,20 213:9 232:16 originally 29:15 93:17 other	7:19 11:15 12:3 14:18 15:15,17 16:14 17:17 19:23, 24 20:3 24:9 25:1 28:1,23 33:22 38:9 39:14 44:17 45:11, 12 47:17 48:15 50:23 54:11,19 55:1 60:2 62:19 67:9 70:17 71:12 73:16 82:20 83:7 89:2 93:5 103:3,7 104:9,10 105:9,11 106:8,18 107:5,6, 11,15 108:15,22 109:21 110:4,15 117:17 118:23 119:15 122:8 132:18 133:13 136:22 142:10 152:13 164:23,24 167:12,13 174:7 180:15 183:18 189:16 197:16 199:8,11 208:20 209:1 218:3 223:11 226:25 227:11 228:10 234:24 242:13,16, 17 our 31:19 58:12 62:14 63:6 71:17,21 72:15 73:7 81:14 97:25 99:14 158:17,19,23 174:18 187:5 189:7,14 193:15 200:9,19 202:16 204:16 214:20 241:16 242:6 245:22 out 6:9,19 20:24 30:1, 24 33:5 36:18,20	38:10 39:17 41:14 42:10 48:21,22,23 50:19 51:18,19 52:5,17 54:8,17 56:5 57:3,4 58:1,5 59:17 60:24 62:1,8 65:6 68:2 69:25 78:9 79:25 80:8 81:9,12 83:10,20 86:3 90:25 98:1,19 107:11,24 113:23, 25 115:17,18,20 116:17,19 117:16 121:22 123:21 126:3,6,10 131:5 132:14,15,18,19 134:13 139:22 141:18 146:7 150:9,10 151:4,8 152:13 154:16 156:20 165:14,18 167:1 169:16,23 170:2,9 171:5 173:16 181:11 182:7,14,21 183:19 184:3 185:1 186:25 187:14,18 190:11 193:11 194:2,10 195:24 196:1 201:8,11,13,14,16, 20,25 209:9,17 211:19 212:8 224:5 226:3,4 229:15 231:9,22, 25 232:2 233:6,13, 15,21,22,25 234:7, 11,15 235:4,12,20 236:15,17,19 237:1,2 241:3 244:13 247:25 248:13 254:1,23, 25 outbound 74:14
--	--	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

outgoing 130:3	10,12,20,22 164:14,20	p19mike@gmail.com. 25:13,15	69:9 70:6 71:7,12, 13 75:1 82:11 83:5 84:2,10,12 89:8 90:1,18 92:21 93:1,2,3,5 95:14, 23 104:8 106:9 162:4,8,11,16 165:4,11 166:12, 14,16,17 167:14 193:3 194:6,7 197:3,9 200:3 201:7,10 207:9,16 208:3,4 209:23 210:10,12,13,17 214:2 219:20 225:11,12 236:6
outlet 252:10	overwhelming 228:19	pa 199:3	
outside 109:13 116:8,22 120:14,17 121:10 244:10	owe 156:3 207:13	pacemaker 41:12	
over 7:6 10:4,14 38:11 55:24 58:20 61:8 67:14,18 69:2 71:19,25 73:23 74:16 77:18 79:5 83:11 103:1 115:15 116:16 117:2 119:8 123:19 124:20 125:17,18 132:25 136:16 143:15 145:23 146:9 154:23 169:17,19 170:12 178:2 189:14 190:4 192:9 193:12,20 202:10 203:2 209:14,15 218:14 219:7 222:13,15 226:7 227:20 231:5,8 232:14 243:1 248:9,10 249:17 252:1,17, 21 253:12 255:22	owed 153:23 172:16 207:13,14,17,18, 20,25 208:1 211:24 220:8 244:19	packed 29:21 229:8	
	own 51:8 54:17 63:12 64:9 67:3 68:2 70:3,5 99:21 134:9 150:8,15 194:13 225:6,7 239:19 241:3 251:13,17 252:3,5 254:15	packing 29:19 94:8,9,14,20 95:1 128:19,21,22 157:6	painted 104:11 105:10
	owner 76:1 90:13,17,23 91:5 95:24	padding 209:11	panel 33:20,22 38:13 185:21,22
	owners 17:17 48:15	paddleboard 48:12	panels 33:16,18,19
	ownership 85:20 91:8 108:2 136:19	page 18:14,15,23 19:1, 4,6,21,22,23,25 20:3,12 87:3 99:16,25 101:8,17, 23,25 102:2,12,15, 16,18,21 103:12, 20 104:5,10,21 105:18 106:1,2,8, 9,12,17,20,22,23 107:15,20,22,25 108:3 136:17,20 145:12,18 146:5, 24 148:12 153:20 168:3,9 217:7,17 221:3 247:19,20	paper 93:15
	P	pages 19:24 20:3	papers 156:25
overdose 41:12	p.m. 56:16 58:24 60:22 62:7 64:4 98:3,5,6 114:20 115:3 116:15 117:19 118:1,8 127:1 128:17 129:16 155:24 157:25 175:6,7 177:9 180:24 187:21 203:18 257:22	paid 50:9 52:24 53:2,4 54:1,3 68:8,14,21	paperwork 18:1 20:10 91:19 164:22,23 217:11
overnight 83:8,11			paragraph 162:2
oversight 209:3 215:11			paranoid 59:15
overtime 111:13,17 112:1, 18,19,20 113:8 162:24,25 163:2,			park 42:18 165:25
			Parker 66:14
			parking 166:1,4 204:7

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Parlay 249:8	password 101:15 159:9	14,20 209:1,8,13, 16 222:3 225:17	period 32:2 56:16 57:11 62:24 87:5 92:9 93:19 121:5 168:11 177:13 187:20 234:1
part 35:9 36:20 42:9 63:5 72:23 91:4,8 122:11 123:12 125:16 134:1 148:16,22 166:17 194:19 196:19 198:13 200:9 202:18 209:4,5,24 217:12,15,21 236:9,18 239:2 245:7	past 9:12 16:15 24:9 49:18 111:9 117:22 181:13 202:10	payments 68:12,13,15,16 69:24,25 70:12 78:18 85:15 91:23 165:22,23 211:10, 12,24 212:4,19,24 213:16 223:2,5	permission 134:5,8 197:21,25
part-time 37:20 52:3 114:24	pay 46:5 54:8 68:17 69:10 70:1 71:4,15 75:12,16,19,22,24 76:1 78:20 81:4 90:11 96:1,5 97:8 107:13 137:15 138:11,15 141:9 142:25 166:1 193:19 194:13 200:14,16,23 207:12,25 208:5 210:21 214:12 225:3,9 245:5	payroll 34:23 91:25 92:1 209:10	person 7:9 38:9 68:24 110:1 205:22
partial 217:1	payables 34:23	Pembroke 42:17,18,19	personal 18:24 19:8,11 23:13 68:2 69:25 88:13,14,16,17,20 89:2,4,10 99:16, 18,22 100:2,4 101:8 102:18,21 103:6,11 125:1 128:14 129:6 225:7,17 226:9 230:9 231:14 245:8,11,12,17 247:21,25 250:2 251:13,17,22 252:4,5 254:3 255:23 256:17 257:1,11
particular 27:19 28:2,9 63:24 159:24 198:6 252:11	paychecks 92:17,19 93:11	pending 137:24 138:9	personally 21:5 125:12
partner 91:5 95:24	paying 34:23 67:23 68:4, 10 69:21 76:17,18, 22 77:2 78:19 82:10,11 83:22 84:12 88:22 93:1 103:17 107:9 166:2,8,18,19 167:18 203:2 211:22 212:11,16 213:20 214:7 219:25 221:22,24 239:3 240:4 244:7, 9	people 33:24 34:2 38:18, 24 39:7 56:11 61:15 64:15 72:13 98:7 110:4 131:12 150:7,9,11 175:19 177:3 186:1 188:7 189:17 201:10 204:25 232:12 247:24 256:15	personnel 61:11 179:4
partners 17:16 48:15	payment 46:2 88:1,4 142:1 200:19 202:25 207:2 208:8,9,11,	per 69:18 139:1 188:3	Petrillo 5:8
parts 65:23 151:15		percent 169:24	pharmacist 41:13
pass 137:20		percentage 95:25 96:5,21 97:7	pharmacy 123:19,21
passed 12:12 14:12		perf 160:11	Phoenix 41:5 48:17 49:4,6
passenger 230:1		perform 157:2,4,5 160:12	phone
passengers 12:8		performance 233:17	
passing 241:20		performed 142:7 199:9 208:15	
passport 82:9 195:25			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>15:21 16:14,16,21, 22,24 17:4 22:5,7, 8,10,12,20,25 23:5 25:22 27:8,9,10 35:23,25 36:5 56:9 57:6,18 60:24 63:9,15 64:12,15 74:7,9,10,12,13,17 79:15 97:18,20 98:9 106:17 109:22,25 116:25 119:17,18 122:18 128:13,14 129:2,3, 6,8,9,10,13,19,23, 25 133:19 140:15 141:13,15,18 151:18,20,22 158:2,20,24,25 159:1,4,6,8,11,13, 14,15 184:12 186:7,25 189:9,10 228:1 229:20,22 230:2,7,14,16 231:16,20 234:22, 23 235:1,2 237:7, 8,9,14,18,20 238:4,7,9,11,20 239:1,3,9,12,13, 15,19 240:2,4,8,11 249:14,16,19,22 250:15,25 254:15</p> <p>phone's 22:17</p> <p>phones 21:18 22:1 56:19 72:15 73:4,7 129:2,6 158:17,19, 23 174:19 176:17, 18 238:2 239:7</p> <p>photo 197:24</p> <p>photographs 63:4 235:11</p>	<p>physical 35:16 159:14,15</p> <p>physically 103:4 110:24 123:16 158:3</p> <p>pick 35:11 63:16 86:3 115:16 123:17 125:11 127:24 133:20 154:15,17 184:5,10 185:21 187:10 195:21</p> <p>picked 77:2 175:2</p> <p>pickup 36:8</p> <p>picture 20:1 149:18,20 151:6,10,12,17,20, 22 197:14,18,20 235:13,14</p> <p>pictured 67:21</p> <p>pictures 148:3,10,19,24 149:13 160:3 197:13,16 198:4 236:1,12</p> <p>piece 86:13 93:15 210:5, 7</p> <p>Pilates 11:19 13:1,7 15:2 20:5 23:16,17 24:10 117:20 223:7 230:18 242:15,16,22 243:6,17</p> <p>pill 122:16,17 123:11, 24</p>	<p>pills 122:10,19 123:4, 21</p> <p>PIN 241:2</p> <p>Pine 42:14,16</p> <p>Pines 42:19</p> <p>Pinterest 119:23</p> <p>Piyo 14:25 15:2</p> <p>PLA 86:25</p> <p>place 51:8 64:16 86:1 152:12 185:15,25 193:20 203:5 225:4,22,25 226:13 232:11</p> <p>placed 8:11 65:3,8,14</p> <p>placing 64:20</p> <p>Plaintiff 5:17 207:16,17,24 223:23</p> <p>Plaintiff's 150:21 223:13 224:10</p> <p>Plantation 42:11</p> <p>platforms 20:19 255:5</p> <p>play 63:2 119:21</p> <p>pleasantry 26:21</p>	<p>please 5:14 6:9 7:24 104:15 121:3 138:7 142:25 147:6</p> <p>Pledger 40:8</p> <p>plug 248:17</p> <p>plugged 231:20</p> <p>plus 165:18 192:1,2</p> <p>po 64:23 251:3</p> <p>point 31:22 34:1 40:1 55:21 71:20 89:21, 25 91:18 93:14 96:11,13 143:22 167:25 179:9 183:18 210:13 215:21,24</p> <p>points 169:25</p> <p>poke 19:2</p> <p>police 139:6,9,17,18,20, 21 140:6,10 149:19,24 150:14</p> <p>policy 61:15</p> <p>Pollock 5:18,25 6:1 8:1 29:13 32:16,17 46:14,19 49:23 66:23 78:15 86:19, 22,23 105:8 107:3, 12 111:3,23 113:1 119:2 123:1,14</p>
---	--	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

124:10,14,17 125:4,14 135:8 138:6 143:21 144:13 146:15,18, 22 147:3 149:4,10 150:17 151:1 152:22 153:3,10, 12 161:6,12,16,20 163:18 164:1 170:8 171:17 173:2,6 191:17,25 193:2 194:1 195:1, 7 204:14 206:4,8, 11,13 210:23 213:14 214:23 217:6 220:24 223:17 224:13 228:13 230:13,15 236:16 241:9,14 244:23 249:2 250:6,8,18,21 252:20 253:14 254:21 255:16,17 256:2,6 257:6,9, 14,21	position 29:14 119:8 possession 156:8 160:7 possible 6:17 250:23,24 251:3 possibly 42:14 148:22 149:8 177:4 post 19:2 53:16 102:3 103:19 105:4 148:3,19,24 149:17,20 246:17 247:18 252:4,7 posted 18:11,19 105:13 149:6,14 152:1,8, 9,12,15 198:1,2 233:23 posting 19:12 98:23 99:6,8 213:9 247:10 posts 18:19,22 19:22 20:7,14 99:2,15,19 148:9 151:11 pounds 41:13 103:2,3 195:21 Power 73:21 practices 196:12 pre 34:21 155:12 pre- 34:21 38:16 94:14, 20	pre-assemblies 38:19 94:8,10 95:1 pre-assembly 52:23 pre-filter 66:1 preface 113:16 preparation 154:22 prepare 241:22 Preppers 179:2 prescription 125:12 134:9 prescriptions 123:23 124:1,23 presence 256:16 present 156:11 157:19 170:19 presented 84:6 preserving 6:23 pressure 189:11 224:21,23 pretty 37:3 60:18 118:24 120:18,19 184:16 prevented 110:25 previous 222:17 price 103:18	prim 74:9 primarily 23:21 24:7 28:22 32:24 54:7 79:21 256:8 primary 15:23 23:24 227:10,15 238:9 240:12,21,23 printed 144:23 145:17 prior 31:1 47:15 50:16 67:19 68:15 101:21 102:1 106:9 155:15 214:25 221:19,20 226:6 Prius 86:8 privacy 100:20 private 15:18 147:24,25 148:18,21,25 149:14 242:17 247:22 privileged 113:19 Pro 5:5 6:2 17:6 25:4,7 27:17 32:19 36:10 37:2 38:8 40:1 70:3,6 83:25 84:4 98:21 99:5,7,19, 21,25 100:13 101:3 102:4,9,11, 15 103:15 104:3, 11 105:15 106:4, 12,20,23 107:19 114:11 119:22
---	--	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

125:10 130:14 131:10 136:20 142:2 143:23 144:2,16 145:13, 16 147:20 159:2 167:5 205:4 219:14,16 231:15 246:8,9 247:13 248:25 253:8,10	production 40:19 products 61:1 professional 11:15 249:7 programmer 101:18 promissory 212:2 prompted 140:25 141:1 Proof 224:18,19 proper 162:4 properly 207:16 property 85:20,24 86:2,10, 12 88:18 211:20 prosecute 139:8 150:3 provide 65:24 81:13 101:13 165:10 193:17 195:9 214:18 240:2 provided 15:18 101:9 234:16 provider 240:9,14 providing 244:19 provisions 82:11 psychiatric 109:12	public 59:17 147:24 Puerto 83:18 120:8 pull 178:6 180:16 pulled 29:8 39:5 151:4,8 pulling 80:7 195:16 pump 35:24 36:16,18 pumps 66:5 83:9 punched 234:7 punching 231:9 purchase 64:23 65:12 185:6, 9 201:15,17 202:3 purchased 165:20 184:23 185:8 purchasing 34:19 35:5,8 purpose 236:19 purposes 250:16 pursue 16:25 put 18:15 26:5,6,7,9, 13,16 55:24 57:18 80:8 83:23,25 86:9 91:7 97:20 150:9, 10,13 152:10 155:7 157:15	170:16 181:24 183:15 186:7 210:1,4 212:7 216:19,20 229:21 248:13,23,24,25 249:9 putting 34:20 58:19 59:24 122:16 178:4 201:12 puzzled 112:2 <hr/> Q <hr/> qualify 193:10 quantified 193:5 Quentin 49:12 question 6:5 7:11 20:21 45:14 62:11 63:21 97:4 122:21 129:1 131:7 137:23 138:9 142:14 148:14 151:10,19 162:17 170:7 177:7 178:11,15 182:5 183:21 186:19 189:18 190:10,13 192:7 202:2 207:22 208:13 209:2 210:3 212:6 215:1, 20 237:22 250:22 255:1 257:10 questionable 253:5,7 questions 6:5,18 9:6 138:8
---	--	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

204:16 214:15 247:19 257:15 quick 26:25 27:2 62:16 230:5 241:7 quickly 50:20 136:1 quiet 56:21 133:19 176:17 178:16 186:15 quieter 184:13 quilts 160:2 quit 30:1,21 32:6 53:17 56:19 128:3 219:18 quite 26:15,17 53:22 57:4 66:13 196:11 206:3 227:15 228:6,21 244:12 247:4,7	rarely 27:23 120:20 232:6,7,8 rate 33:10 rated 101:24 rats 193:25 re 86:7 255:18 read 85:6 257:16 reading 107:6 257:18,23 ready 36:7 real 230:5 realize 132:22 realized 114:23 131:3 really 17:20 18:16 19:17 20:10 23:24 59:14 64:25 81:21 128:11 176:11 178:15,16 190:7 198:19 227:7 228:24 reason 31:8 54:19 99:11 103:11 140:11 171:22 183:5,12 197:12,17 206:16 208:24 211:3 226:16 245:2 254:8,9 255:12,18 rec	46:23 recall 10:1 14:20 42:11 44:13 45:9 69:11 93:8 149:15 receipt 87:25 185:11 receivables 33:12 receive 85:1,12 90:19 143:9 215:22 218:3 received 13:8 14:6,8,12,14 18:2 46:10 58:9 84:14 89:3 111:8 142:8,15 145:1,8, 13,16 160:25 177:3 200:23 207:2 208:16 217:11 218:12 220:4,6 221:4 receiving 85:11 212:9 reception 28:19 29:7 56:8 recliner 183:10 recognize 86:24 record 5:4,15 6:23 8:12 46:17 78:11,13 86:18 135:5 138:4 146:21 150:24 152:21 153:7,8 161:8,11,19 173:1 204:13 214:22 217:5 220:22 223:16 224:12	237:8 241:12 recording 5:13 140:14,16,19 234:16,18 235:5 records 74:13 128:14 129:2,25 156:18, 19,21 159:21 180:9 188:19 237:7,8 239:1,4,9, 14,15,19 240:2,12 recover 112:20 163:10 164:13 recreational 245:14 Reddit 119:23 redesigning 189:12 referring 163:3 208:1 refilling 123:12 refills 122:12,16 123:16, 18 124:1 reflect 6:11,13 87:25 88:4 184:24 reflecting 185:7 refurbed 152:5 refurbished 152:6 refuse 34:7 214:9 refused
R			
Radio 11:21 15:10,16 raft 233:18 raise 7:8 raising 140:16 ran 92:1 134:13 range 239:23,25			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

85:25 96:25 97:2 101:20 139:9 141:4 150:3 refuses 156:10 refusing 156:11 regardless 21:3 registered 16:21 17:9 registrations 246:19 247:1 regularly 207:11 regulators 189:11 reimburse 201:2,4,5 reimbursed 88:5,11 236:10 reimbursement 88:9 225:16 reimbursements 87:23 reimbursing 89:8,11 reiterated 104:7 related 98:17 250:16 253:9 255:1 relating 253:8 relationship 104:17 193:15 200:20 208:6 212:5	relaxed 176:24 released 109:19 150:4 relevant 244:7 relink 55:8 relinquish 55:8 relocate 84:25 160:23,24 relocation 84:22 rely 9:5 182:8 184:25 204:22 remedy 234:9 remember 39:8,22 77:21 100:19 121:3 136:4,6 225:20 reminders 122:18 remotely 237:21 removed 41:10 rent 40:2 48:13 71:4,15 75:1,6 81:13 83:10 166:1,7 195:3 203:4 245:5 rental 69:22 70:7,11 75:12 78:7 rentals 48:12,13	rented 75:7 166:4 renting 226:1,3 rents 78:18 repeat 20:21 218:21 replaced 41:11 reply 145:11 report 250:10 reported 253:3 Reporter 5:3,10 7:23 29:11 49:20 66:20 78:10 143:19 153:8,11 161:4,10,15 206:9, 12 241:7 257:20 reporting 5:9,13 252:18,25 represent 6:2 56:14 reproduced 151:11 request 77:12 99:14 214:20,25 238:25 239:20,21 242:6,8 requested 41:6 43:1,11 99:17 122:2 147:23 148:13 209:2 required 212:3,19 requirement	230:23 research 250:3 researching 250:10 reserve 98:21 107:20 119:22 resided 70:7 residences 70:17,19 71:21 74:22 residing 71:2 76:16 77:9 resolve 138:15 respect 93:10 112:19 170:2,21 respond 99:22 142:24 251:12 responding 129:21 230:7 response 26:25 99:13 207:1 239:21 242:9 responses 9:6 105:17 204:16 208:16 214:20,25 responsibilities 34:15,18 35:6,15, 20 38:6 40:24 50:12 responsibility 34:10 36:17 93:10 responsible 38:9 122:15 193:5
---	---	---	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

rest 86:4 160:2 171:18 183:10 222:7	reverse 138:18 140:23 141:1 143:24 213:7	15:5,19 23:9 24:11 36:9,13 37:4 39:8 40:1,11,19,22 48:5 50:1 52:6 57:25 58:18,24 59:18,19 60:4 61:6 62:11 63:7 65:4 70:8 73:24 76:23 77:10 78:16 83:15 86:1 87:6 88:15,24 89:12 97:9 98:9 99:1,2,7,12,13,17 100:3,5 106:13 108:13 111:14,20 112:5 114:12 115:6 117:21 118:12 119:12 120:6 129:17 135:22 139:13,22 140:15,22 142:9, 18,19 144:22 145:1,17 146:1,3,4 149:7 150:11 151:12 152:16 154:25 161:1 163:19 164:7 165:20 166:6,12, 20 167:3,6 171:2 175:1,7,11,19,22 176:1 181:1,9 182:14 183:25 185:17 190:5 191:2 192:3 193:23 194:18 195:9,10,13 196:7, 13,15 198:2,13,24 200:4 205:5 206:20 207:20 208:2 209:4 211:11 212:17 213:18,22 214:3 215:4,5,8 219:17, 24 220:9 222:21 227:4 228:4,11 229:16 231:11 236:1 238:3,7,12,	15 239:5,8,11 243:9,24 244:11 246:5 247:16,23 248:22 249:24 250:4,20 251:1,22 252:9 254:12,19 256:4,10,13,18 257:1,12
restaurant 197:4	reversing 213:3		rights 107:17
restaurants 82:12 120:13,17 121:9	review 131:14 143:23 144:1,2,15,20,24 145:6,8,9,11,14, 15,19 146:23 147:4,8,13,15,17, 18 160:22 174:24 242:1,3 251:9 253:4		rise 204:6
restrained 110:25	reviewed 161:24 218:11		rising 69:15
restraining 134:16,22 135:18, 20 136:1,8,10,22 141:7 142:4 144:7, 17 146:12 148:2,6, 11,20,24 149:11 211:5	reviews 56:10 97:24 98:18 102:3,5,7,8 119:19 131:13 133:7		road 9:2
restrict 47:16,17	revised 214:16,24,25		Rockhurst 10:25 11:2,5
restricted 103:10	Revival 249:8		roll 8:21
result 135:9,17 209:19	Rica 53:23		roof 55:22
resumed 46:18 78:14 161:9 241:13	Richard 65:22		room 158:18 227:23 229:14 244:19
retire 48:18	Rico 83:18 120:8		rooms 193:23
retirement 41:14,20 48:21,23 165:15,16 193:11	rid 95:19 100:16		rough 198:19
return 43:9 101:20 116:4 185:23 187:6	ride 44:2 133:14		round 121:18
returned 26:10,13,17 140:18	ridiculous 33:25 192:21,24 193:1		rounds 177:4
returning 182:4	right 6:20 7:2,13 13:22		run 29:10 35:10 50:14 57:4 62:15 91:25 103:1,4 107:14 124:22 125:1,12, 21 236:18,20

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

running 103:6 126:6 236:12	117:15,24 118:3 123:24,25 125:17 128:7 132:12 135:17 138:10,17, 23 139:14 140:4,8, 19 143:10 145:19 149:8 150:14 152:5 153:9 155:4 156:17 158:23 159:21 160:22 162:16 164:18 165:14 174:1,3,14, 23 177:9 178:5 180:13 185:2,20, 24 186:2,17 189:20 191:3 196:24 197:1 200:8 201:4 203:17 208:7 215:11 218:22 220:13 226:8,14 228:2 234:19 242:10 247:10 250:23 257:7	62:1 185:11	120:12 121:12 122:9 127:22 129:20 147:6,10, 12 150:6 157:3 170:13 174:3 178:14 188:5 189:1 190:2,3 209:17 214:11 234:12 235:8 236:7 248:16 255:23
RV 41:14,19 48:21 165:6,8,12,20,25 166:3,4 194:8 200:14		Salty 20:5 24:12,16 48:7 197:11 256:20	
S		same 9:1 30:17,23 31:9 62:3 71:14 72:14 108:17 127:5,19 131:16 132:24 151:15 168:10 170:21 173:17 189:25 202:14 207:18,20 210:15 215:3 226:11,16 242:14,18 245:1, 19 249:19 250:19	
S-A-I-L-S 24:13,16		San 41:15 154:17 166:8	saying 38:8 58:4,10 59:22 60:10 63:22 72:17 85:10 90:7 95:18 96:15 100:13 104:23 106:23 113:17 120:15 121:13 122:6 123:15 124:25 128:7 144:19 150:1 158:21 176:3 177:17 179:24,25 184:19 187:3 190:6 195:2, 6 199:23 200:1 219:10,12 222:6 226:5 236:5,22
S-A-L-E-S 24:13,16		Sand 231:24	
S-E-L-L-I-T 23:20,21		Saturday 127:23 174:13,18 175:10 188:14 189:20	
sacrifices 228:10,14		savings 89:18,19,20	
safe 133:25 134:3,4,10		saw 33:4 66:9,10 117:3 153:18 203:22 217:10,16 226:22 247:8 253:3	says 145:15 168:4,25 169:7 207:24 217:22 221:15 223:23
safest 232:11	sail 195:19 196:6 248:7	Sawgrass 42:6	SCA 9:23
said 11:24 14:5 19:20, 22,25 20:9,23 24:12,17 26:8 27:8,12 28:3,4,20 30:15,22 31:23 32:18 35:5 37:18 38:23 39:1,4 43:10 45:4 46:21 47:21 48:20 52:19 53:6 55:18 56:15 58:1, 13 59:4,22 64:8 72:25 73:2,4,6,25 74:4 81:2 85:13 88:8 91:9 94:23 98:2,11 100:17,18 105:1,2,19 106:2 114:17 115:20 116:14,16,17	sailboat 79:6,18 80:21 82:19 115:7 194:24 195:9	say 17:24 18:5 20:20 23:11 27:10 29:17 30:11 35:19 36:15 43:20 58:25 59:14 61:18 72:7 73:6 74:6 92:14 102:8 107:1 108:17	scale 175:21
	sailboats 195:4		schedule 55:20 56:1 57:12 58:4 59:6,7,12 60:5 61:21 62:14 117:21 126:16 127:5,7,16 128:2 133:15
	sailing 79:17,20,24 80:5 155:10 245:20 248:7 256:14		
	sails 80:7		
	sale 247:12,15		
	sales 24:12,16 55:22		

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

scheduled 136:7	58:6 70:3,6 83:25 84:4 91:20 98:21 99:5,7,19,21,25 100:13 101:3,5,6 102:4,9,15 103:15 104:2,11 105:15 106:4,12,20,23 107:19 114:11 119:22 125:10 130:14 131:10 136:20 142:2,8 143:23 144:2,16 145:13,16 147:19 159:2 167:5 205:4, 14 217:3 218:4 219:13,14,16 231:10,11,15 243:7 246:4,8,9 247:13 248:25 253:8,10 255:10, 14	securing 154:20	175:22 247:8
school 10:15,18 81:22		security 8:10	Sellit 23:20 24:2
sclerosis 12:25		see 21:18 39:13 52:12 56:13 62:12,20 63:18 65:11 87:9, 17 95:11 99:2,6,8, 12 100:5 106:7 117:11,13,21 128:15,22 129:14, 22 130:5 131:2 135:12,14 136:24 144:18 150:9,11 162:2,4 163:7 164:22 168:6,23 169:1,9,11 190:16 191:13 192:8 198:16,18 202:6, 13 217:14,19 218:14 221:13,17 222:25 229:15 241:15 245:17,22 246:19 247:13 249:18,20 252:2	sellitmindy@ gmail 23:18 sellitmindy@ gmail.com. 24:2
screaming 110:21			send 33:9 35:24 36:16, 18 65:6 95:21 96:16 138:10 160:19,21 185:19 212:25 216:10 251:10
screenshot 217:16			sending 33:8 159:11 160:16
scribble 160:11			sends 145:6,7
scribbled 156:25			sense 54:21 57:21
script 134:13			sent 26:2,4 85:15 95:13 96:14 123:19 137:14 141:8,12 142:1,17 145:13 146:9 147:19 160:19 170:11 213:2 216:4,8,21 217:1 220:7 221:1 232:14
scroll 106:15	seawaterprollc@ gmail 27:9 Seawaterprollc@ gmail.com 25:20 Seawaterprollc@ gmail.com. 25:10	seeing 209:10 223:11	sentence 207:15,21
search 135:9 245:25 246:3 247:3,14,17		seems 37:2	sentences 207:18
searched 106:4		seen 66:6 152:23 153:13,21 161:22 173:3 204:15 217:7,8,9 220:16, 23 241:19	separate 70:4 75:16 76:9 84:17 101:14
searches 246:18,21	second 20:8 67:18 92:6 97:3 108:1 129:9 168:8 177:16 178:11 180:22 191:1 210:12 214:17 217:19 238:4	sell 20:15,18,24 21:6, 11 143:1,3,5,8 152:2	
searching 247:1 251:7	seconds 198:24 232:22 234:14 235:4	selling 20:12 23:22 24:1 34:24 38:11 126:2	
seasick 195:19	secure 80:9		
seat 229:24			
Seawater 5:5 6:2 17:6 25:4, 7,18 27:17 31:21 32:19 36:10 37:1 38:8 39:25 40:16 50:24 51:2,8,13, 16,22 52:1,25 53:9,11,14,24 55:2			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

separately 75:7	sh 200:8,12	34:19	243:12 250:20
September 8:9 112:12 237:9, 12 240:1,13	shaking 6:10	ship 29:15 38:12 184:20,21 187:9, 15	short 31:1,23 32:2 46:16 78:12 93:8 138:13 156:4 161:7 241:11
series 19:9,10	share 70:4 102:21 103:25 104:10 153:4 161:17 165:5	shipment 126:6	shorter 56:25
served 136:6 220:17,18 239:22	shared 103:5,11,13	shipments 36:24,25 117:9 126:10	shortly 41:5 92:8
service 196:2	she 7:9 26:10,13,17 28:23 29:10,18,21, 23 30:8,9,10 31:2, 18,19,23 32:1,3,4, 5,6,7,8,12,13,18, 19,20 33:9,10,11, 13,14,15,18 37:18, 20 39:1,19 51:12, 16,18,19,23,24 52:2,5,7,8,9,13,14, 17,22,23 53:1,4,5, 6,16,17,18,21,22, 23,25 54:1,3,17 92:6,7 94:6 104:19 105:2 114:25 205:14,15 207:17	shipped 36:4 50:13 185:1	shot 234:9,21,22,23
set 17:20,23,24 18:9 20:3,10 24:13 28:1,18 38:23 63:3 73:18 101:7 102:1 107:15 245:16	Sheldon 189:14	shipping 33:10 34:22 36:9, 10,17,20 37:1,3,5 38:10 50:17 51:24 52:20 57:19,20 187:8	should 27:10 42:23 63:25 64:5 91:4 99:20 103:17 106:25 141:10 149:5 164:24 190:16 191:13 197:2,9 200:2 211:7 236:6, 9 239:15 255:23
setting 34:17,25 56:7 61:25 67:3 106:9 122:18	shelf 38:16	shoes 157:11	shoulder 119:9 249:17 252:1,17,21 253:13
settlement 165:17	shell 17:20,23,24 18:25 20:10	shook 6:12	shouldn't 191:14 203:23 246:25
setup 71:14	shelves 34:17,21 50:14 57:23	shoot 19:17 104:24 105:2	show 32:13 34:7,8 38:24 43:19 45:24 63:4, 23 64:3 74:14 83:18 86:15 92:16 128:24 130:2,24 135:2 150:20 152:18 154:18 156:5,12 166:24 172:23 180:21 189:2 199:11 204:11 206:6 214:19 216:24 217:2 223:13
seven 10:14 114:20 170:24,25 203:2,3 212:5	shelving	shooting 234:12 235:8	
several 32:12 53:16 60:13, 15,16 66:7 80:16 84:11 104:7 114:8 141:3 159:25 181:21 187:3 191:20 202:17 205:19 208:11 232:23 233:1,15 241:24		shop 29:24 31:19 34:3 36:7 44:3 56:23 66:8,10,14,18,19 71:22 108:11 114:25 124:21 126:4,9,21 127:18 128:9,23 131:23 133:17 151:13 154:14,15 156:19, 22 159:22 174:4 176:15,18 184:14 187:23 188:4,5 203:22,23 229:6	

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

224:9	signing 93:21,22 156:12 257:23	sitting 39:7 116:2 121:14 201:7	42:1 47:11,12,14 48:12 146:5 179:13 233:24
showed 149:21 173:16	silly 19:7	situation 89:6,7 110:15,18 113:14 139:11 164:5	smaller 47:22 48:3
showing 156:24	Silversneaker 12:22	six 12:8 33:24 39:7 40:14 49:18 98:15, 16 133:1 174:4 177:22 190:3 249:11	snap 236:1
shows 34:25 56:8 106:10 107:2,3 146:10 197:14	simple 34:17 125:21	Six-pack 11:22 12:5,15 14:16 15:7,16	snippet 145:9
showtime 154:19	sin 257:7	six-years 16:15	social 8:10 18:8 20:19,23 21:6 27:1 35:2,4 56:10 57:7 97:21, 22 98:11,12,15,17, 20 105:4,11 107:21 119:10 198:2 233:24 245:7,8 246:14,16 249:14 250:15 251:8,14,17,19 252:3,5,10,11,22 253:1,23,25 254:11,18 255:2,4, 7,14 257:2
shut 33:18 43:8 44:20 61:2,8 83:15,19 121:1	since 13:2 16:1,2,12 19:3,22 20:20,22 21:1,5 22:1,11,17 23:11 24:9,12 41:21 66:25 69:21 78:23 79:1 82:20 83:7 84:4 89:10 90:1 99:17 100:9, 12 104:12 120:12 153:21 163:20 166:22 172:17 196:1 218:4 219:21 221:23 223:11 240:16 241:24 253:18	skating 201:3	sold 21:16 24:5 41:19 58:20 151:4,9 167:9
shutdown 249:9	single 81:10 86:13 203:21	sleep 52:2 180:17	solely 67:25
shutdowns 61:6	sit 82:14,15 202:8	sleeping 34:2	some 6:4 24:5 31:8 52:23 56:4 61:8 63:4,5 64:17,24 65:1 67:21 81:18 83:9 93:14 95:24 99:15 105:17 107:9 120:3,7 126:18 133:2,6 141:11 149:16 154:15 156:19,25 159:21 160:19 172:12 173:10,11
shuts 178:19	site 98:20 106:11 247:12,17 248:1 252:11,12	slept 31:18,19	
shutting 60:25	sites 98:23 101:24 152:2 233:24 247:9 248:2,3,5 256:8	slip 9:9,16 69:21,22 70:6,11,16 74:21 75:6,20,22,24 76:2,9,12,17 77:2, 6,7,16 78:7 167:14 208:5	
sick 143:6		slipped 157:11	
side 145:18 231:25		slips 75:8,9,12 166:11	
sign 64:8 91:18 92:19, 25 93:11		slow 72:16 73:7 74:4	
signature 92:16		small	
signed 71:3 88:18 92:2,15 94:7 130:9 203:1			
significance 223:20,24 224:14			
significant 122:8 228:10			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

221:23 226:4 234:20 248:9,10 somebody 27:1 35:25 36:16 91:25 105:18 106:25 107:10,13, 16 110:15 126:9 175:1 184:23 196:3 249:7 someone 64:11 someone's 184:25 something 6:24 27:2,5 36:5 43:19 57:8 74:10 82:1 100:11,17 103:17 106:24 108:13 115:8 116:10 117:3 119:16,18 124:6 131:1 141:20 184:23 187:14 189:2 192:2 199:12 201:21 209:15 211:11 214:8 216:19,21 222:22 229:13 230:5 234:8 247:15 248:16 251:9 253:4,7,8,9 sometime 45:20 52:16 57:13 68:8,21 103:22 163:13 181:10 182:12 222:21 225:1 sometimes 26:5,18 56:24 58:2 60:7 62:7 97:19 122:20 127:18 175:12 230:6 243:13 257:3	somewhere 49:4 159:20 233:24 son 29:25 30:16,19,21, 23,25 31:5 37:5,7, 8,14 38:7,25 39:2 50:22 62:2 63:3 67:8 84:21,24 85:6,16 110:11,12 214:3,7,10 215:15 216:3 217:13 225:4 son's 105:19 160:3 206:21 214:11,13 soon 6:16,19 202:23 241:10 sorry 11:25 13:17 14:11 17:22 20:21 37:12, 24 38:4 39:18 44:5 45:3 47:4 49:15 50:8 65:20,21 76:7 78:10 81:24 82:24 85:13 90:6 94:17 109:15 113:11 120:24 121:2 134:2 137:22 161:14 166:13 189:13 190:3 215:5 218:17 221:7 222:11 246:15 251:16 sort 90:19 sources 242:8,13 South 49:14,16,24 51:1,7 73:9 166:7,10,15 200:4	Southwest 17:14 28:9 29:3 39:9 space 39:25 Spain 61:2 Spanos 5:5 6:2 10:5,9,13 87:14 125:10 135:11 164:25 207:11,24 217:13 Spanos' 87:9 speak 13:11 97:21 131:4 188:7 253:19 speaker 57:18 97:20 186:7 speaking 57:17 220:2 special 36:6 121:4 specific 27:13,16,18 201:6 speculation 250:5,17 253:11 255:15 spell 7:23 66:20 67:11 143:19 spelling 206:9 spend 115:22,23 122:3 133:23 201:25 228:7 244:10 spending 121:21 174:22 186:24 249:13	251:19 254:4,10 255:2,13 spent 60:23 202:9,13 219:1,4 234:15 spilled 69:4 spin 12:3 spite 30:1 splinter 157:10 spoken 66:24 241:17 spot 166:1,4 spring 32:6,8 51:20 square 40:2,3,17 47:23 48:3 64:18 68:10 179:10,14,21,24 180:14,25 181:5, 11,22 182:14,23 186:22,23 St 33:9 stalking 134:23 136:13,14, 16 stand 54:21 standards 32:9 standing 119:8 Stanley 10:20
--	---	---	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

star 98:14 144:2,15	status 16:23 193:18	stipulate 185:25	64:19
start 7:7 13:21,24 16:17 17:2 19:12 23:14 32:1 38:18 59:14 62:20 63:19 77:16 107:13 242:22	statute 112:24	stipulating 119:13,14	stronger 41:19
started 13:25 14:3 16:16 25:25 32:4,20 34:15 38:7 42:12 45:6,11 46:21,25 58:6 62:8,25 66:15 68:4 78:9 85:11 92:6,8 93:14 94:5 98:20 100:10 107:25 120:25 126:12 127:6,7 128:6 134:21,22 177:17 190:7,12, 13 191:2,10 199:16 200:12 219:6,14 232:9 241:3	statutes 114:4 172:12	stock 18:2 50:14 64:21	struggle 114:5,6
	stay 66:18 83:8 127:4 137:10 179:4 183:11 225:4	Stokes 67:12 132:16,18	stuck 61:1
	stayed 58:21 66:18 83:10 122:2 225:5 227:18 243:12	stole 54:17	studios 42:1 47:11,12,14, 18
	staying 30:8,9,10 179:5 193:22	stolen 33:18	stuff 23:22 28:1 66:16 74:15 99:9 100:6,7 105:17 123:23 126:2 154:21 156:13,25 158:24, 25 187:6 189:8,11 245:13,19 255:23 256:10
	stays 165:7	stopped 44:21 47:9 51:23 52:19 57:3 59:14 62:8 90:3 100:12, 22 114:11 159:7 166:18 203:16 212:24 223:11	stunt 39:5
	still 16:10 32:7 38:22 48:19 53:10,13 54:13 57:1,5 61:23 69:1 72:2,15 74:19 79:14 80:21 92:2, 14 94:7 98:24 101:17 106:7,10 109:7 116:8 118:17,18 121:9 122:4 136:11 154:8 155:21 157:6 158:17 166:23 167:23 174:18 177:5 181:13,22 182:2,4 189:2,3,6 192:6 195:14 197:24 210:12 240:3 244:3	stopping 219:25	subject 90:12
starting 21:13 219:13 232:16		stops 213:19	substances 123:17
state 5:14 17:10 85:7 104:16 150:3		storage 176:5 179:9	sucked 203:10
stated 85:16 86:11 90:10 102:17 104:4 118:17 133:7 202:16,17		store 86:1 98:19	sue 220:1
statement 21:10 87:4 220:6,7 221:1,4,16,20 222:3,18,19,20,23 223:1		stores 119:21	sum 43:14
stating 102:12 119:6	stint 32:19	straight 32:9 44:3 92:22	summer 12:11,17 13:25 14:17 16:2 19:13, 14,15 20:20,22 21:1,5 22:2,11 42:21,24 43:4,13, 15 47:5 51:20 52:6 79:11 108:5 120:12,15
		street 42:12 43:11	
		Stripe	

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

Summons 152:19	swelling 157:15	137:20 140:20 147:22 148:9,19 149:12 153:20 161:4 166:25 183:19 184:10 186:2 187:13 188:21 194:24 195:19 197:16 199:3 214:9 216:17 234:13 241:7 243:15 246:11,20,25	178:8 216:3 218:3
Sunday 131:14 174:18,24 175:11 188:15 189:20	swimming 80:8,9 197:7		talking 7:6,9 14:16 19:21 36:4 37:17 43:12 57:16 65:4 92:24 94:17,19 97:17 98:7 102:8 107:23 109:21 112:23 116:6,7,13 129:5, 24 131:3 139:3 141:15 149:23,24 173:21 176:13 177:8 186:25 187:20 191:9 198:6 199:5,7,8,22 204:3 207:21 208:1 209:14 211:12 213:10 230:2 233:8 238:1, 8 248:2 249:11 251:4,5
Sunrise 42:7	switch 241:1		
supplemented 206:5	sworn 5:23		
supplied 66:2	synced 23:8		
supplier 65:5	synopsis 235:11	taken 77:13 104:16,17 117:22 185:18 194:17 235:2	
suppliers 65:8	system 33:11,12,21 63:2, 20 64:14 93:16 94:6 117:12 129:4 151:4 245:23	takeout 184:5	
supplies 64:21 65:5,23		takes 27:5 122:10 137:4 199:4,5,14 232:23 233:1,15 234:13 235:7,17 247:4	
supply 66:2	T		tape 150:13
support 156:5	T-U-B-B-E-R-T 7:25	taking 53:21,22 63:9 64:10,12 67:15 72:15 73:8 74:6,7, 8 79:15 89:11 121:18 154:21 174:22 183:25 219:16 229:22 232:16 233:23 235:13,14 236:12	tasked 126:10
supposed 83:18,20 101:19 107:24 124:22	table 116:2 173:15,17		taught 43:5,18,25 45:5,15 118:8 242:17
sure 14:20 19:13 20:2 23:14,23 30:20 38:15 46:14 54:12 65:10 68:18 73:21 81:12 92:4 98:6 111:16,19 123:18 129:18 161:6 168:22 181:6 218:7,19 225:10 228:9 241:9	tables 173:12		teach 42:25 43:10,16,20 44:16,19 117:18, 25 118:3,12 230:20
surfing 53:19	tag 246:4 249:9	talk 7:5,6 39:17 109:25 110:2 116:2 141:21 216:11 231:21 252:10	teaching 44:23 223:7 231:9 243:6,17
sweeping 34:17	tagged 105:14	talked 14:19 20:11 38:5 46:20 51:25 66:6,8 74:21,22 78:16,17, 18 96:24 110:4	tearing 34:25
	take 6:3 7:9 8:15,25 9:1 10:21 13:21 39:19 46:12 60:8 78:21 79:19,20 81:25 82:20 86:4 97:16 98:2 99:25 106:16 110:21 117:22 122:19 128:13 133:2,21 134:7,14		technical 80:6
			technicality 150:5

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

technically 167:16,17	text 22:25 23:4,6 85:6 91:3 95:15,22 96:17,18,20 129:21,22 137:14 138:11 141:8,11, 12,14,17,25 142:15 160:22 203:23 212:25 216:21,24 217:1, 10,13	that 5:12 6:6,12,22 7:17,23 8:11,15, 18,21,24 9:1,5,22 10:11,19 12:11,16, 17,18 13:4,22,24, 25 14:1,19 15:5, 13,17,19,24 16:1, 3,5,10,12,16,19,21 17:1,5,8,9,19,25 18:5 19:16,24 20:3,4,23,25 21:4, 7,10,12,14,15,18 22:4,7,9,10,12,17, 20,23 23:21,23,25 24:4,7,8,12,24 25:1,2,3,11,21,24 26:2,3,4,8,22 27:6, 12,13,23 28:8,10 29:2,4,10,17,21, 23,25 30:1,14,15, 21,22 31:2,13,23 32:1,2,11,15,19 33:4,9,15,17,23 34:4,11,13,17 35:5,17,19,21,23, 24,25 36:5,6,11, 13,15 37:8,18 38:7,8,15,16,25 39:1,3,5,6,12,13, 24 40:1,3,4,11,14, 18,19 41:5,6,8 42:12 43:1,3,10, 19,21 44:2,3,8,11, 14 45:7,8,15,18 46:8,21,22,23 47:3,5,10 48:11, 15,20,24 50:4,8,16 51:4,6,11,16 52:2, 6,7,14 53:1,3,15, 17,18,25 54:1,2,15 55:14,16,18,23,24 56:11,24,25 57:7, 9,12,14,19,24 58:1,4,5,6,10,13, 15,17,18,24 59:1,	11,16,19 60:25 61:5,6,16 62:3,5 63:1,4,5,14,22,23, 25 64:2,25 65:2,8, 14,15,19 66:4,10, 13,14,24 67:4,8, 13,19,23 68:11,13, 15,19 69:1,4,13,18 70:8,13,18 71:3,20 72:5,6,8,10,22,23 73:16 74:4 75:3,4, 5,13,17 76:16,20, 22 77:2,3,5,9,13, 15,16,24 78:2,18 79:4,6,9,10,11,14 80:14,15,16,19,20 81:4,12,13,16,19, 21,23,25 82:6,18, 22 83:1,3,5,14,19 84:7,8,9,15,17,21, 23 85:9,14,17,21 86:1,5,9,10,11,13 87:6,13,14,17,24 88:23,24,25 89:3, 8,21 90:7,10,18 91:3,6,10,11,14,22 92:7,14,15,21,24 93:1,2,6,7,18,23 94:25 95:13,18,19, 20 96:2,6,7,11,14 97:8,11,14,24,25 98:2,13,17,20,22 99:7,11,18,19,20 100:6,8,13,16,21, 24 101:5,7,10,11, 16,21,22,25 102:1, 2,12,13,17,18,19 103:1,4,9,11,12, 14,18 104:1,4,7, 11,16,19,21,22,23 105:1,13,14,18,20, 21,23,24,25 106:1, 2,3,8,9,11,14,17, 18,20,23,24,25 107:10,13,17,20, 22,25 108:3,6,7,
tell 8:19,25 34:2 35:24 36:16,17 55:19 64:15 86:4 89:21 113:19,20 140:6 181:9,17 187:16 200:25 216:6,10 217:8 236:24 251:1 253:21	texted 95:12		
telling 62:18 91:3 117:17 119:9 146:11 178:8 187:12 188:1 189:15 192:9 208:19	texts 26:10		
tells 124:15	than 15:15 24:9 33:10 36:25 38:9 39:25 44:17 52:7 104:9 105:11 107:6 108:15 109:21 116:2 117:17 118:23 119:15 133:13 148:14 163:11,23 164:14 166:6 167:13 170:25 177:8,24 181:25 190:8,14, 21 191:5,10,12 192:4,11 199:11 201:12 215:25 220:11 234:4 235:6 248:3,5		
temp 219:7			
tended 27:19 35:3 56:25			
term 33:14 140:10	Thank 26:23 27:3 46:15 153:11 206:12		
terrified 116:5	thanking 26:25		
testified 5:23 154:4 255:9	Thanksgiving 71:25 73:18,25 130:15,16,17 131:7,8,9 132:8 184:1		
testifies 255:20			
testify 8:16 65:14 143:18 205:23 255:3,6			
testifying 9:1			
testimony 8:21 43:3 137:5 206:25 227:22 244:8			

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

15,17,21 109:5,7, 10,12,21 110:1 111:4,5,11,13,15, 16,25 112:2,4,8, 16,17,18,20 113:7, 10,16,23 114:10, 12,20,22,23 115:1, 3,4,5,19,23 116:1, 10,16,17 117:3,4, 15,17,19,24,25 118:2,3,17,21 119:4,6,16,23,24 120:1,11 121:6,7, 18,19,24 122:2,7, 21,22 123:4,16,18, 23 124:1,2,5,6,20 125:6,16 126:19, 22,24,25 127:1,5, 10,16 128:7,11,15 129:2,3,4,10,14, 17,25 130:8,9,10, 11,12,13 131:3,5, 14,20 132:6,7,13, 17,19,22,24 133:6, 7,9 134:7,15,22, 24,25 135:6,7,12, 14,17,18,21,22,25 136:2,7,14,19,22, 24 137:13,18,22 138:10,13,17,19, 21,25 139:4,12,14, 15,22,24 140:6,9, 14,15,17,19 141:3, 5,6,9,17,18,19 142:1,2,3,5,6,7,9, 14,18,19 143:7,10, 11,17,18 144:1,2, 7,19 145:1,4,13,15 146:9,12,15,23 147:6,11,12,16,18, 19,22,23 148:1,16, 22,23 149:6,13,19, 21,23,25 150:2,4, 5,6,8,10,16 151:3, 4,6,10,13,17,20, 21,23 152:2,3,15,	25 153:21,22,23 154:4,9,19,21,22 155:5,8,9,12 156:2,6,12,13,15, 17,23,24 157:1,2 158:3,4,5,15 159:6,8,13,17,18, 21,22,24 160:2,4, 5,12,19,23 162:3, 5,7,16 163:1,5,7,9, 10,15,19,20,22,23 164:10,12,13,14, 16,18,20,22,23,24, 25 165:2,4,12,14, 15,16,19 166:1,2, 5,12,17 167:2,4,6, 24 168:2,4,5,6,12, 17,23 169:1,5,9, 10,11,22 170:11, 22,23,24 171:8,20 172:11,18,21 173:10,15,16,17, 22,23 174:2,3,19 175:5,14,19,22 176:3,8,10,11,14, 19 177:6,8,25 178:1,5,23 179:9, 10,18,23,24,25 181:1,3,6,19 182:22 183:3,4,5, 12,18,20,22,23 184:1,9,11,16,25 185:15,16,18,20, 24,25 186:5,8,18, 21,22 187:7,8,11, 13,16,18,20 188:1, 7,8 189:1,6,12,16, 25 190:2,6,23 191:8,13,19 192:4 193:3,4,5,6,10,15, 19,20 194:7,8,16, 18,19,21,23 195:2, 6,15,17,18,20,24 196:4,5,19 197:2, 8,11 198:1,2,8,9, 23,24 199:9,13,14,	15,19,20,23,24 200:1,2,3,8,11,20, 22,24,25 201:1,2, 7,21,25 202:2,4,7, 11,15,16,18,20 203:17,21,25 204:1,2,5,8 205:5, 20,23 206:22,23 207:1,4,5,11,12 208:6,7,20,22,25 209:9,10,11,22,23, 25 210:3,4,9,16,20 211:3,10,11,16,17, 19,23 212:3,7,9, 10,19,22 213:2,10, 24 214:4,8,10,11, 15 215:17 216:4,8, 12,22,24 217:9,11 218:2,10,19,21,22, 23 219:2,12,17,20 220:7,8,9,10,11, 12,13,15,16 221:1, 4,15,17,20 222:1, 4,6,15,17,18,19 223:1,2,10,20,21, 25 224:2,14,15,22 225:9,15,19 226:1, 3,8,14,15,22 227:4,5,6,14,22,25 228:3 229:1,2,8 230:20 231:8,10 232:1,3,6,11,17, 19,21 233:9,10,12 234:4,7,8,13,23,25 235:1,5,7,12 236:5,11,17,18,22, 25 237:2,10 238:7, 9,11,15,17,20 239:1,18,22 240:3, 8,14 241:2,3,15 242:10,11,16,17, 21 243:5,6,17 244:1,3,8,9,13,24 245:7,8,17,20 246:2,4,11,20,25 247:1,8,9,12,14,22	248:19 249:5,25 250:1,14 251:7,9, 24 252:4,5,7,12, 15,16 253:4,9,25 254:6,9,23,25 255:6,12,19,22,23 256:15 that's 12:5 15:4,7 17:11 20:6,25 43:23 44:21 45:8 58:23, 25 59:18 61:23 62:18,19 72:1,25 73:17 74:15 79:16 82:3 86:24 88:25 90:16 92:12 93:16 95:6 98:10 99:21 101:25 104:13,25 106:12,17,22 107:19 113:19,22, 25 114:3,17 117:1 118:10 122:9 127:19 128:3,5 135:23 138:17 140:22,24 142:19 143:16 144:19,25 146:24 154:17 155:12,23 162:7 163:8 171:2 172:1, 2 174:1 175:7 176:1 178:4,12 181:3 184:15 188:11 190:3,7 191:2,3,9 192:3 196:11 198:12 200:19 207:5 210:14 212:21 214:4 220:2 221:19 222:6,22, 23 223:18 224:15 226:20 228:4 229:18,19 231:3, 10,21 236:3,19,24 237:1,18 238:11 240:11 243:20
--	---	--	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>247:3 249:4 250:7, 12 256:17,20 257:13</p> <p>theft 202:7</p> <p>their 27:1 36:8,21 44:8 49:11 60:25 65:20 71:22 84:13 97:23 100:19 128:24 150:7,15 174:21 199:16 225:6,7 248:8</p> <p>them 6:19 21:24 34:20, 25 44:7 46:10 49:14,16 56:13 61:8 63:23 65:19 66:1 70:2 71:18,23 80:22 83:10 89:11 97:20 99:13 104:11,24 105:2 113:14,18,19 114:2 122:16 123:5,17 128:14 131:2 133:7,25 137:11 140:2 149:6 155:6 156:20 157:5 170:16 174:22,23 183:19 186:7 188:8 198:8 204:22 209:1 215:19 218:14 220:2,4,8,10 241:17 244:16,19 247:24 248:10,13 249:4</p> <p>then 7:1,4 13:7 14:5,14 19:5,20 20:3,11 22:15 24:5,13,17 27:2,12,20 28:5 29:17 32:4,8,18</p>	<p>33:22 34:14 37:17, 24 38:3,5,17,18 40:9 42:12 43:11 44:3,9,15 46:21 47:21 48:2,6,7 52:4,5,10 53:6 54:6 55:19,20 56:2 57:5,7 58:16 59:4, 11 60:4,19,22 61:21 62:3,16 64:20 65:1 68:1 70:15 71:18 74:21, 23 75:19 78:2,17 79:19 83:17 85:1, 15 86:4 92:2 93:13,17 94:23 97:5,16 100:4 101:2 112:18 120:5 123:22 124:22 126:12,22, 24 127:20 128:1 129:14 131:4,25 132:18 133:20 135:16,17 136:1, 13,21 142:4 145:10,11,17 152:1 155:9,22 157:20 159:12 166:18 167:8 168:23 169:9 174:6,9,10,17,18 175:2,10 177:24 178:12,23 179:16 181:17 182:16,19 183:10,18,21 184:10 187:7,8 188:13 189:2,6,12 192:14,17 194:4 198:18 199:13 203:7 206:14,25 208:7 209:8 213:19 214:1,6,15, 16 215:6,8,9,16 219:7,23 226:18 227:20 229:14,15 230:25 231:5,21,</p>	<p>24 233:15,16,17, 20 234:1 236:20 240:22 241:6 243:1,14 245:13 257:10</p> <p>there 9:11,12,14,24 10:5 14:11,20 16:22,24 19:23 20:6 23:14 25:3,12 27:13,19, 20,24 28:3,4,5,20, 21,22 29:4 30:17, 18,23,24 31:6,10, 14,17,23 32:18 33:15,16 34:19 36:5,10,11 37:9, 18,25 38:8 39:7 40:15 41:15,16 42:12 43:18 44:2, 5,6,7 45:23,24 46:12 50:23 52:9, 15 53:1 56:5,21,22 57:23 59:6 63:22, 25 64:5,17,24 66:6,9,11 67:25 68:13,14 69:4,24 70:17 71:2,19 72:22,23 73:14,24 74:15 75:1,8 76:9 77:9,11,25 81:9,10 82:14 83:8,11 86:8 87:8,17 89:2,5 93:3,7 101:14 105:17 108:12,21 113:17 114:24 115:16,18 116:24 117:4,8,13,20 122:5 126:5,9,22 127:3 130:19,22, 23 133:3,15,19,24 138:13,23 140:12, 14,16 141:3,10,14, 25 143:17 145:15 149:22 150:9,10 152:17 154:4</p>	<p>158:3 159:20 160:13 164:23 168:1 170:6 173:12,15 176:8 178:2,3 180:1 181:9 182:10,15 183:18 184:22 185:6,7,15,25 186:5,15 187:10 189:3 193:22 195:10,13,23 197:8,12,17 198:3, 9,11 200:13 203:12,13,21 205:19,24 206:3, 16 208:24 211:25 212:2,3,4,5,18 225:12 226:6 227:3 228:9 229:11,12 230:22 233:10,15 234:7,8, 19 236:13,15,17 238:3 241:21 242:16 243:9,13, 14 245:2,7 247:13 248:25 250:13 251:11 254:8,12</p> <p>there'd 184:24 185:17</p> <p>there's 16:21 18:6 19:22 23:23 63:1 64:2 84:23 96:20 109:5 111:17 128:15 131:14 136:21 140:13 141:17 144:20 170:23,25 174:24 176:10 194:22 196:19 197:19 198:1,14 205:25 224:4 246:21 247:15,18, 19 248:3 256:25 257:7</p>
--	---	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>thereupon 5:20 46:16 78:12 86:17 135:4 138:3 146:20 150:23 152:20 153:6 161:7,18 172:25 204:12 214:21 217:4 220:21 223:15 224:11 241:11</p> <p>these 33:19,24 34:5,12 42:20 43:25 50:17 66:24 71:11 80:14, 18 83:22 89:1 152:10,13 153:25 155:12 173:12 189:16 201:10 203:23 207:8,17 208:16 214:18 221:2 229:23 234:16 239:7 242:5</p> <p>they 33:4,5 34:7,8 36:12 38:24 39:6 44:20 46:5 56:11, 12 65:17,25 66:2 70:22 71:12,13,16, 20,21 77:13 87:11, 23 92:21 100:1,11, 15,17,19 104:22 105:2,19 106:1 107:10 108:2,3 113:19 114:2 128:22 130:19 131:12 133:7,8 137:9 139:22,23, 24 142:16 150:15 157:25 158:4,12 165:11 170:16 172:4 174:21 181:2 185:20 187:4,9 195:3,9,19 204:20 207:13,14,</p>	<p>25 208:1 209:11 219:7 220:12 226:4 241:25 245:23 246:17 247:18 248:16,17, 19,22 249:3</p> <p>they'd 37:3</p> <p>they'll 65:6</p> <p>they're 73:13 87:20 105:3 138:9 141:18 153:23 201:8,11 248:13,23,24,25</p> <p>they've 114:8 201:13</p> <p>thing 97:23 98:25 127:20 131:16 140:19 195:3 203:1 214:1 226:11</p> <p>things 35:17 54:18 57:24 58:16 63:18 141:3 154:15 156:25 183:18 186:5,15 187:13 189:16 201:14,24 211:21 229:6 230:6 234:19 245:17 251:8 255:25</p> <p>think 14:1 19:16 24:12 25:2 28:4 39:20 44:13 45:8 48:9 72:11 81:9 117:18 123:7 132:3 135:22 136:9 137:20 140:9 158:2 188:20 192:23 193:1</p>	<p>195:16,17 199:12 202:15 204:17 210:13 255:9</p> <p>thinking 212:10</p> <p>thinks 214:8</p> <p>third 32:5 82:21 135:11</p> <p>this 5:13 9:2,5,12 18:12,20 19:3 21:13 30:3 36:12 48:9 49:17 55:5,7 57:10 61:10,18 62:24 65:18,23 74:1,19 85:3,5 86:24 87:3 88:1,5, 8,13 97:3,4 100:10 102:17 103:19 105:1 106:20 107:22,25 110:14, 18 111:8,12,20 112:4 114:5,9 116:13,24 117:22 130:9,19,24,25 133:12 135:9 138:5 139:11 140:21 143:12,13, 14 144:21,23 145:19,23 146:6,7, 10,14 150:19 151:2,23 152:1,24 153:13,14,21,22 155:16,17 156:3 157:8,9 160:6 161:13,22 162:8, 13,14,18 163:4 164:22 169:15,23 170:10 171:5,6 172:6,10,13,17,22 173:3,7,10,18,19 175:13 178:12,16 181:7 187:19</p>	<p>196:11,16 198:9 201:11 202:11 208:17,22 209:2, 18 214:1,24 217:10,11,12,20 219:23 220:23,25 221:4,16 222:3,20, 23 223:1,21,22 224:4,20,21 226:5 234:11 240:3 241:18,20 242:15 244:7 254:3 255:4</p> <p>Thomas 33:9</p> <p>those 7:21 10:7,8,11 11:3,8,17 12:21 14:2,5,22 18:22 19:12 20:19 21:22 22:1 25:9,16 38:23 40:6 44:16,19 56:24 64:8 70:12, 19,20 75:9 79:12 87:9,18,21 89:12 92:22 93:11,13 99:2,12,15,20 100:5 108:8 109:3, 6,11 113:8 115:11 119:12 130:20 131:10 137:1 154:3 157:23 165:5 168:10,15 171:19 178:4 181:14,21 189:5 198:4,5 204:15,18 206:4,8 215:3 216:1 228:15 239:17,23 240:11 243:7 244:13 247:5 248:9,15</p> <p>though 7:4 12:14 26:12,16 38:22 66:12 112:12 154:3 160:9 197:24</p>
---	--	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>205:14 237:25 245:19 251:15</p> <p>thought 56:13 85:13 192:21 196:5 202:15,23 210:6,9 211:8,10 213:23 253:4 256:15</p> <p>thoughts 31:16</p> <p>thread 217:10,21</p> <p>Threads 252:9</p> <p>threaten 54:22,24</p> <p>threatened 55:1 140:23 143:24 213:6</p> <p>threatens 213:3</p> <p>three 9:12 19:7 40:4 41:11 42:25 43:5, 10,18,20,21 49:10 67:14,15,19 72:11, 17,24 77:11,12,14 109:2,3,6,11 111:13,18 112:17 113:4,9 132:25 135:24 140:24 154:6,7 155:5 160:25 163:11,23 164:14 198:9 202:12 210:8</p> <p>threw 156:20 160:1 185:12</p> <p>through 5:10 6:18 16:6 17:8 44:23 45:5,15</p>	<p>47:5,12 53:25 55:22 59:16 60:13, 14,16,21 63:22 64:18 65:9 72:14 74:17,18 86:3 87:5 94:10 103:15 104:22 112:21 119:20 126:14,15, 20 127:6,19,22,23 128:17 129:15 137:13 150:22 152:9 158:6 174:10 180:20,24 181:12 182:20,24 187:25 214:3,7,15 217:3,8 218:20,24 243:18 245:10,12, 17 247:2,10,20 249:14</p> <p>throughout 16:7 24:3,6 109:18</p> <p>throw 185:24</p> <p>thrown 160:6</p> <p>Thursday 44:9,11,15 45:19, 20 117:25 118:2,4, 5 131:8,12</p> <p>Tibby 93:2</p> <p>tie 174:21</p> <p>tied 27:10</p> <p>tighten 234:20</p> <p>Tiktok 18:10,11,19,20,22 19:5,8,12 20:15 98:18 105:15 252:8</p>	<p>till 43:9 52:15 56:4,5, 21 176:9 243:18</p> <p>time 7:10 18:6 22:4,10, 20 29:14,17 30:8, 17,24 31:2,9,13,24 32:2 33:4 35:23 37:21 38:23 40:3, 4,25 41:18 44:1,3 48:14 49:17 51:16 52:3,21 53:1 54:2 55:5,7,19,21 56:17,21 57:11 58:6,10 59:16 61:2,3,10 62:3 63:5 64:25 67:18 72:14,22 73:5,6 74:4 75:13 76:16, 20 81:20 82:6 91:7 93:8,19 96:14 97:11,25 98:13 102:18,19 103:5 105:25 108:21 111:4,15 115:4,22, 23,24 116:13 120:11 121:18 122:12 124:19,20 125:18,19 126:1, 10 128:10,11,12, 16 129:4,11,17 130:2,11 132:13, 17 133:12,23,24 138:12,13 142:5, 14 143:7 163:5 165:19 168:11 169:10 170:3 178:1 179:23 180:9 182:20,21 183:23 184:2,9,11 186:21 187:20 188:1,7,8,18 190:1 194:6,8 195:15 197:8 201:2,4,5 202:14 203:9</p>	<p>204:8 208:12,17 209:9 210:4,21 217:10 221:23 222:13,15 227:25 228:5,6,7 229:10, 18 231:8,10,11 233:5 234:1,6,15 236:13,17,21,25 237:1,2,10,12,21 240:14 242:20,21 243:15 244:7,9,11, 13 245:2,7,19 246:12 249:13,20, 23 250:14 251:18 254:4,10,14 255:2, 10,13</p> <p>timeframe 20:25 24:4 25:23 28:25 33:17 43:12, 14 56:17 62:6 100:19 242:14,19</p> <p>timekeeping 63:2 93:16</p> <p>timeline 220:3</p> <p>times 27:25 33:10 35:3 36:20 44:4,6 56:6, 20 66:7 69:24 95:12 104:7 114:8 115:11 122:19 155:13 170:25 173:16 176:6 186:15 191:20 201:1 202:17 208:11 209:14,15 210:11,12 241:24 243:12 246:2 247:21 254:1</p> <p>tinkering 33:20</p> <p>tips 19:9,10</p>
--	--	--	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

tired 90:12 183:8	20 120:7 151:13, 16,19 157:19 216:15 223:10 232:23,25 233:2, 12 234:4 235:14 247:13	transfer 88:14	trips 19:11 78:22,23,24 82:20 83:7,22 120:7 194:17 223:10
title 50:11 160:4		transferred 87:14 225:13 226:6,15,18 238:11 241:4	Tropic 91:11 96:8 97:6
today 6:22 8:16,22,25 74:19 85:22 165:1 173:21,22 208:20 241:23	top 31:20 34:1 54:7 144:22 195:23 200:22 213:4 221:3 222:21 228:19	transferring 238:14	trouble 45:25
together 35:22 49:9 63:13 65:17 73:19 74:1 76:12,15,21 77:1,9 79:24 125:20 137:9 158:22 167:9 200:4 227:5 244:10	total 10:12 87:11 168:5 169:9 187:22	transfers 87:8,19,20,21 89:1,3 218:4,6,12	truck 54:7
told 15:17 48:6 53:17 54:10 56:2 57:7 59:5 72:8 84:10,21 87:14 95:16,25 96:4 97:7 105:1 113:14,17,18 114:2,10 117:19 126:13 139:8 141:17 142:20 150:4 156:20 158:5,8 160:9,10 173:20,22 175:5 181:4 191:20 192:3 195:24 196:22,23 200:22 206:1 208:19 215:18 216:8 220:4 225:9	totals 168:17,20 172:4	translated 187:11	true 108:18 109:21 118:10 134:12 137:13 147:1,10, 17 171:18 196:11 204:18 229:19 249:8,25 250:7,12 252:6 257:13
touch 54:13,20	touched 139:9,14,17	transport 71:24	trust 81:2 146:16
toward 223:2	towards 88:1,4,23 193:3	transportation 15:12 235:15,16	trusted 210:18,19,20
town 154:16,17	toys 201:21	traveled 120:1,3,6 193:12 219:2	truth 8:19,22,25 139:19 204:22 216:7
tracking 63:20	trade 34:25 43:18 45:24 56:8	traveling 53:22	truthfully 8:16
traded 159:7	traditionally 58:5	treatment 102:13 111:9	try 6:6,16,17 7:10 111:25 112:17,19 114:8 121:14 137:9 138:18 201:23 202:3,6 223:8 239:12
transcript 6:11		Trek 98:14	trying 20:24 30:24 57:25 60:24 79:25 80:1, 2,3 116:18 117:16 119:22 121:17,22 122:11 128:23
		Trevor 40:8 61:15 93:3,14 186:17	
		trial 9:2 135:23,24,25	
		tricks 19:9,11	
		trip 72:7,9,10,23 73:2 79:4 80:15,24 81:4 82:18,19 83:3,5 108:15 157:9 195:24 196:16	

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

139:4 141:16,18, 23 146:6 169:15, 23 170:2,9 171:5 177:12 178:7,14 181:6 182:7,21 187:18 199:10 224:5 234:10,15 235:4	78:21 79:2,5,6,12 80:20 81:4,10 83:4 85:15 87:8,17 89:1 100:10 120:16 129:2,6 132:8 136:22 143:15 145:19,24 146:8 172:3 177:25 178:1 194:24 195:18 200:3 202:11 204:1 207:18 209:15 219:23,25 221:25 222:2 227:19 232:22 234:14,19 235:3 238:2 242:15 243:5,7,13, 14,16 244:1,9	255:8 un 16:9 unable 101:11,13 163:10 unbelievably 127:13 under 16:9 69:12 82:7 99:16,21 105:22 107:4 112:16 114:5,22 173:22 220:9 232:19 240:3,8 251:13 underneath 159:25 understand 6:5,7 8:18,24 57:25 84:9 99:20 111:11,16,25 112:1,4,8,16 113:7,10,12 117:14 129:5,25 130:8,10 136:10 139:24 141:6,16 142:12,23 145:23 147:19 163:9,19 164:7,8,10,13,15 165:4 170:19 175:14 176:10 177:12 178:7,14 181:6,8 185:6 187:24 199:10 254:25 understanding 52:24 54:1 111:20 114:5,6 120:25 136:14 144:14 148:23 170:10 173:8 218:23 234:10 242:5 understood	54:4 149:6 170:21 173:17 186:4 Unfortunately 219:22 uninspected 12:9 unit 151:13,14,15,17 167:4,6 176:5 198:15,22 232:22 233:16 234:3 247:8 249:11 units 34:22,24 38:13,19 50:13 103:2 187:4 Universal 5:8 University 42:13 unless 45:23 124:15 141:21 247:15 unpack 30:3 199:13 unpacking 199:11 unpaid 168:5,18 169:9 172:4 untied 233:5 until 12:19 25:25 29:4 34:7,14 35:7 37:5, 14,18 43:13 47:24 52:4,5,17 56:16 57:10,12 58:2,6, 14,21,22,24 59:7, 8,16,22 60:11,12 62:5,6,24 63:2 65:1 68:8 92:1,20
Tu 44:8 Tubbert 7:22 8:7 23:25 49:2,12,13 50:22 tube 232:2 Tuesday 44:9,15 45:18 118:3,5 Tuesdays 118:6 turn 82:1 152:10 159:16,17 198:16 230:14,16 231:16, 19 turned 67:17 100:13 TV 98:14 224:1,2 twice 52:1 Twitter 252:9 two 10:4,7,8,11 21:18 27:5,20 28:3,12,20 31:7 33:16,19 38:12 49:7 51:12 55:22 58:19 70:17, 19 73:16 74:22 75:8 77:12,14	two-and-a-half 235:6 two-page 153:5 two-week 82:19 typical 126:15 174:2,3 176:13,14,15,16 177:9 187:5 typically 173:23 174:13 176:5 186:20 <hr/> U <hr/> ultimately 139:24 Um-hum 43:22 47:2 49:22 82:2 92:11 96:10 159:10 160:21 169:8 176:12 188:10 231:2 243:19 246:10		

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>94:4,5 95:1,2,3 120:16 127:4 129:9 130:21,23 131:22 172:6 174:9 176:3,4,25 180:2 189:3,21 190:17 211:3 218:15 220:4 222:21 238:4 240:19 242:25 243:7,13</p> <p>unusual 174:20</p> <p>up 17:21,23,24 18:9 20:3,10 24:13 28:1,10,18 32:13 34:7,8,13,17,25 35:11,14 37:4 38:24 40:1 44:10, 11,14 45:19 56:7 58:22 59:5,8,16 61:1,25 62:1,5,14, 24 63:3,16,22 64:4 65:8 67:3,15 69:15 71:17 73:16,18 77:2,8,15 78:9 95:11 97:16 98:3 100:16 101:8 102:1 106:5,9,10 107:15 115:16,25 117:24 118:6,13 119:16,18 120:9 121:4,8 123:5,17 125:11 127:5,8,24 128:24 133:21 148:2 150:7 154:15,17 157:15, 20 166:9 174:21, 22 175:2 176:3 180:16 184:5,10 187:10 189:2 190:17 193:18 195:21 197:7 199:20 202:8,13</p>	<p>203:3,4 204:1,5 217:25 221:3 229:5,7,9,10 233:25 245:16,18 246:5,20,21</p> <p>update 100:20</p> <p>Updated 161:21</p> <p>upgrade 22:7,9,23 23:1,4</p> <p>upgraded 22:5</p> <p>uploaded 99:2</p> <p>UPS 60:24 117:10 186:25</p> <p>upset 67:16 95:13 126:7 141:2</p> <p>upstairs 27:21 28:4,7,13,15</p> <p>urgent 158:14</p> <p>us 7:8 12:24 15:17 30:10,11 33:8 38:12 48:6 52:2,7, 15 56:11 58:20 62:3,18 65:3 66:9 67:20 73:17 79:3 80:13 81:14 87:14 114:10 117:19 130:20 131:21 151:3 156:5 173:22 174:24 175:5,16 191:20 192:3 198:14 200:12 206:1 218:24 225:5</p>	<p>226:4 234:16 239:22 240:2 244:14,16 253:21</p> <p>use 16:10,17,22 17:4,5 21:19 23:7,24 24:3 25:6 27:12,14,16, 19 28:3,6,12,14 91:22 109:22 119:11 125:22 134:7 140:10 198:21 201:23 251:22</p> <p>used 5:12 16:1,14 23:12 24:8 25:1,16,21,24 27:23 28:22,23 33:14 75:9 91:20 99:22 166:23 219:15 224:24</p> <p>uses 28:17</p> <p>using 15:21 29:2,6 129:10 197:17,19 252:4</p> <p>usually 35:25 56:18 126:18,21 127:2, 23 129:18 132:10 174:15 182:25 186:2 189:22 248:22</p> <p>utilities 71:7,8,15 75:2 78:18</p> <p>utilizing 245:23</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>vacation</p>	<p>31:18 72:23</p> <p>vacations 78:20</p> <p>vaccinated 61:17 120:21,22</p> <p>vaccination 121:5</p> <p>vaccine 121:6,7,8,13,15,23</p> <p>vaccines 120:11 177:4</p> <p>vague 104:13</p> <p>Valley 10:18</p> <p>value 90:21</p> <p>valve 185:25</p> <p>varied 183:3 188:16</p> <p>various 12:3 16:6 53:18 57:23</p> <p>vehicle 12:9</p> <p>vendor 35:11 65:16,18</p> <p>vendors 35:11 65:13 66:24 91:23 185:9</p> <p>verbal 142:25</p> <p>verdict 134:25</p> <p>Verizon 15:25 16:5,8,9 130:1 238:21</p>
---	--	--	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

240:18,19 241:1 versed 213:25 version 161:21 214:16 versions 234:24 versus 251:21 255:10,14 vertical 172:2 vessel 9:16 12:9 194:21 vessels 37:4 video 140:12,13 149:21, 23,24,25 150:2,7 198:11,18,23 199:7,15,18 219:17 231:23 232:19,21 233:24 234:2,9,12,13,21, 25 235:3,6,8 249:10 videos 19:7 63:5 67:22 98:23 105:12,13 148:3,10,16,19,25 149:13 198:1,5,6,9 199:11 232:14 233:23 234:16,18 248:8,9,16 view 193:23 255:25 violate 145:3,4,5 146:11 213:20 violated 146:16	violation 144:7,16 213:24 violence 139:7 Virgin 33:8 visit 29:24 30:6 31:4 visitors 109:23 110:7,8 176:18 visits 157:20 voice 140:16 vol 145:3 <hr/> W <hr/> W2 46:7 94:2 W2s 46:10 92:20 wage 150:19 155:13 162:14,21,23 164:19,20 197:3 200:23 211:17 wages 84:2 85:3,9 111:17 112:1,18 137:15 141:5 153:23 162:4,8,11,12,19, 20 165:2 167:19 168:5,10,18 169:10 172:5,14, 15 207:8,9,14,17, 19 208:2,3 210:6, 9,10 211:6 244:18	wait 12:12 49:25 83:8 93:7 144:18 190:2 199:17 211:9 229:22 waited 211:3,7,8 waiting 44:4,7 227:23 229:14 waive 257:16,17,19,20, 21 waived 257:25 walk 143:6 194:5 204:8 wallet 84:18 want 6:24,25 29:22 30:3 31:8,10 38:6 39:20 56:13 59:5,7 80:6 82:8 86:19 89:22 100:18 110:23 113:16,18,22,23, 25 116:8 118:20 123:5 130:18,19 132:11 181:7,8 188:2 192:8 202:22 242:11 247:24 251:16 252:10 257:15 wanted 16:25 19:25 29:10 48:21 56:12 64:23 84:25 85:6 86:4 89:24 115:8 117:4 118:24 121:5 150:11 160:1,23 166:24 186:1 188:25 193:19	195:13 201:21 202:17 226:4 233:17 251:15 wants 228:7 warehouse 27:24 28:5,7,8,9 29:3,7 36:12 39:10,24 40:2,4, 10,17,18,22 41:6 45:10,11,12 47:23 48:3 61:12,14,16, 24,25 62:2,17 63:14 66:5,6 68:10 104:23 125:11 127:3 128:9 151:24 176:4 179:9,10,11,14,20, 24,25 180:13,14, 25 181:5,11,15,23 182:14,19,23 184:10 186:22,24 187:21 190:11 202:24 203:3 231:6 243:3 warning 39:15 warrant 196:1 warranty 159:16 washer 224:21,23 wasn't 20:7 21:16 27:25 29:9,22 33:11 43:18 59:17 94:12 96:1 100:17 103:4, 6 108:10 117:7 119:8,14 133:3 150:2 157:11 167:19 174:2,20 176:14,15 177:5,7
--	---	--	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

178:16 187:8 195:14 202:2 203:21 206:22 210:3 212:6 219:12 220:3 229:11 232:11 236:18 237:22 250:22 252:17,21, 24 253:16 255:23 watch 129:19,21,22,23 watched 33:6 watching 248:8 255:4 water 12:24 13:16,18 65:19 70:12 233:18,21,22 234:1 236:21 237:1,3 Waterart 12:23 watermaker 107:19 151:6,8 152:3 166:25 167:2 231:24 232:17 236:12,20 247:8 249:10 251:12 watermaker's 247:2 Watermakers 17:8 18:12,23 19:1,6,9,11 20:6,9, 16,18,24 21:4,6,16 24:14,17,23 48:6 50:17 56:12 99:9, 23,24 watermakersllc@ gmail 24:22	watermakersllc@ gmail.com. 24:15 way 6:6 29:10,21 33:5 43:19 44:17 46:12 54:11 60:16 62:19 93:2,6 94:10 107:6 115:21 122:5 142:10,20 146:10 161:13 175:21 184:5,25 200:12 217:23 233:23 ways 110:14 182:7 we 5:3 6:19 7:4,6 8:21 9:5 10:7 14:19 20:11 23:14 26:4, 23 27:3 28:8 29:4, 24 31:1,7 33:14 35:14 36:2 39:4,14 40:2,3,4,24 41:15, 19 45:12 46:12,20, 23 47:25 49:10 50:19 51:25 52:8, 9,13 55:18 56:3,5, 6,8,19,20,23,24 57:2,3,4,5,15 58:8, 18,20 59:3,15,16, 24 60:2,19,25 61:14,15,24 62:7, 10,11,14,15,16,20 63:8,9,13 64:17 66:16 71:16,18,22, 24 72:6,8,14,15 73:7,18 74:6,13, 21,22,23 78:16,18, 22 79:2,24 80:12, 13 81:13,14 82:21 83:9,10,17,19,20 84:11 85:22 86:12 87:13,24 88:12,17, 18 91:11 92:6,15,	20,24 93:1,2,3,5,6, 13 96:7 97:17,23 99:4,5,13,19 100:3 107:25 108:11 120:14,19 121:1,9 122:3 125:19 126:2,18,20,22 127:2,3,12,13,23 128:13 129:1,3,13, 14 131:14,19 132:3,6,10 133:7 137:25 141:20,24 143:13 146:15,18 147:22,23 151:3 155:15,19 158:16, 18,22,23 159:8 161:4,10,11 162:15 163:22 164:20 165:8,10 166:16,17,18 167:21 171:2 174:6,18,21 175:12,15 176:8 177:21,24,25 178:2,4 179:5,7,13 180:6,9,10,21 181:13 182:2,3,7 183:8,23 184:3,5, 25 185:21 186:16, 17,18 187:3,23 188:4,18,19,25 189:1,2,3,6,11,14, 20 190:9,11,16,21, 22 191:13,14 192:6 193:4,12,17 195:23 196:8 198:6 199:15,17 200:8,13 202:15, 20 203:1,2,6 204:22 206:4,9 210:18 214:1,15, 16 215:7,21 218:2 219:1,2,4,17 224:22 225:25 226:1,3,12 227:5, 20 233:15,20	234:7,9 235:3,18 237:7 238:1,5 239:12 240:1,5 241:7,20 242:20 243:13 244:13 we'd 57:18 97:20 100:5 182:15 253:15 254:17 we'll 6:17 128:15 257:19 we're 6:3 19:15,16 85:21,23 94:17 102:8 107:23 116:6,13 129:24 151:10 158:17 165:1 169:4 173:20 176:13 179:4 187:20 191:9 198:15 209:14 236:19 238:7 241:9 248:2 251:4,5 we've 99:17 171:24 181:25 239:17 wearing 157:11 weather 121:11 web 198:1 website 18:6 189:12 197:12,13 websites 119:9 152:10,13 197:24 week
--	--	--	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

31:17 32:5 43:21 44:4,5 60:17 83:15 93:25 96:12 97:12 98:2 108:7 109:7 114:21 115:2 116:21 117:22 126:16 130:12,15 131:7 133:3 154:4, 9 155:5,8,9,23 163:1,6 169:13,14, 16,19,20,25 170:1, 4,5,10,22 171:7, 11,12,13,19 174:2, 4,17 175:17 176:13 178:23 181:25 186:9,20 187:12,16,19 189:5 192:12,15, 18 209:16 243:5,8, 17 244:1,4	87:4 89:14,20 92:15 219:19,25 220:8,20 221:1,5, 9,12 went 32:5,6,7,8,24,25 33:3 39:3 41:15,17 42:10 55:22 58:10 60:19 62:10,16 68:1 72:2 74:12 78:9,22 79:2 82:21 87:17 93:13 95:6,8 105:25 106:3,19 108:1 110:18 114:15 116:17 120:13 122:3 125:25 128:3 132:3 152:13 154:14,16 155:15 158:16 170:20 177:18 181:8 182:2 203:4,22 212:14 214:15 224:22 227:15,16, 17 240:7 245:16 249:10 were 9:1 10:11 14:2 19:20,23 21:15,22 23:7 24:1 25:9 26:8 27:20,21 28:3,20 29:2 31:16 33:4,5,18 34:12,13 35:22 36:11,12 40:6,9 45:12 47:10,21 49:4 50:23 52:11,13 56:6,12,20 57:2, 15,23 58:11,18 59:8,24 60:22,25 61:8,11,12,14 62:6,9,12,13 63:8, 9,13,15,24 64:10, 12,14,17,20 65:2,8 66:16 67:6 68:13,	14 69:4,20,24 70:12,17,20,22,24 71:11,12,13,16 72:4,15,22 73:4,7, 8,16 74:6 75:5,8,9 76:12,15,16,18,21, 25 77:4,8,15 78:6 79:13,17,22,24 80:13,14,15,20 81:10 83:17,20 87:23 89:5 91:11 92:6,21,24 93:1 94:9,14,20,25 95:13 96:5,7,11 97:6,11,14 98:2, 11,15,16 99:2,6,16 103:3 104:23 105:2,17,19 108:5, 6,11,12,18,21,25 109:5,7,10 110:10 111:4 114:17 115:6,13 116:14, 15,19 117:15 118:15 119:15 121:10,12,14,21 122:6,7,15,21,22 123:7,8,15,19,24 124:2 125:19 126:2,3,5,20 127:12 128:22 129:10 130:6,11 131:12,13,14,19 132:19 133:3 137:10 139:4,11 140:8,11,22 141:3 142:6 143:8,9,13 144:15 148:16 154:5,12 155:5,10, 22 156:7 157:3,23, 25 158:22,23 159:8,22 160:12 162:3 165:3,8 166:10,15,17 167:8,21 169:21 172:3,9 173:12 174:8,18 175:12	176:8 177:25 178:3,4 179:5,7,24 180:6 181:2,4,13, 22 182:2,3,13 186:5,9,15,17,20, 25 187:1,4,17,19, 20,22,23,25 188:4, 9,14 189:3,6,17,19 190:6,9,13,19,22 191:6 192:4,6,11, 14 193:5 195:23 196:6 199:15,24 200:4,8,13 202:4, 5,16 203:2,18 205:3 207:8 209:11,23 210:5, 10,13,16 213:16 220:12 221:24 222:5 225:21,25 226:1,3,12 227:20 229:12,23 230:9, 18 231:8 233:6,21 234:12 235:5,17, 18 236:11 239:12 242:16 243:6,13, 17 244:4,13,19 245:6,8,23 249:13, 14,18,22 250:2,3, 10,15,25 251:5,18 252:4,11,12,14,22, 25 253:1,9,23 254:4,10,15,18 255:7,10,13 weren't 29:20 56:8 93:21, 23 107:10 111:5 117:17 121:9 141:14 158:4,19 162:7 179:13 190:20 194:12 209:23 229:8,12 234:25 243:7 252:18,24 what 7:21 9:20,22 11:17
---	---	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

12:7,21 14:22 15:21 16:3,12,19, 25 17:24 18:5,19 19:5 23:3,7,11 24:1,21 25:14,23 26:22 28:25 29:14, 18 30:20 31:16,22 32:22 33:1 34:10, 12 35:14,20 36:17 39:25 42:15,23 44:1 46:2 48:11, 17,24 49:11 50:11 51:22 52:22 53:3 54:3 55:6,14,18, 19,20,21 56:16,17 57:1,11,19 59:8, 11,21 60:5,10,14 62:7,9,11,13,18, 19,21 64:10 65:19, 23 67:2 70:22 71:7,10 72:25 77:24 78:2,24,25 79:12,17,22 80:1, 24 82:19 84:19 86:3,15 87:13,21 88:22,25 89:21,25 90:8,16 91:13,18 92:5 96:13 98:16 99:14 100:7,10,23 101:16 102:12 103:25 104:2,6,20 105:4,9,11,16 108:10 110:10 112:3 113:12,17, 18,19,23,24,25 114:1,3,25 115:7, 11,13,15 116:16, 19 117:11,13,14, 15 118:14 119:9, 10,11,15 123:25 124:11,18 126:15, 25 127:15,16 128:1,2,5,22 130:1 134:18 135:2,7 136:14 137:17,18, 24 140:25 141:1,	13,19,21 143:22 145:12 146:24 148:15 149:25 150:14,20 151:3 152:18 153:4 155:9 156:17,18, 21 157:4,8 158:8, 21 159:6,12,13 160:1,10,13 161:17 162:13,16, 17,22 165:12 166:13 169:16,19 171:6,12,19,24 172:3,21,23 173:20,22 174:1 175:5 176:2,21 178:8 181:8 182:7, 20,21 184:24 185:1,7 186:8,25 187:1,15 188:1 190:16,23 191:2,9 192:3,11 195:2,6, 18 196:22 199:10 200:7,10 202:6 204:11 205:9 207:13 209:17 210:9,13,20,24 211:18,23 212:21 213:10,15 214:4, 11 215:21,22,24 217:2 221:2,13 222:23 223:10,24 224:5,9,19 226:5, 20,25 227:9 228:4 229:2 230:9,10 231:14 234:23 235:3,4 236:3,22, 24 239:3 241:22 242:3,13,23 243:1, 10,18 245:22 246:19 247:9 248:23 249:18,20, 22 250:10,15,19, 24,25 251:5,22 252:2,12,13,25 253:21,22,23	254:14,18 255:2,3, 20,21 what'd 216:6 what's 7:17 8:8 9:8,18 16:22 17:1,12 101:16 124:5 144:14 162:10 169:13 170:4,9,10 173:7 181:20 183:13 214:19 223:20 224:14 231:14 256:25 257:1,11,12 whatever 82:1 112:21 118:24 119:23 184:19 194:10 202:12 203:18 234:2 244:18 252:9 whatnot 230:2 Whatsapp 74:16,17,18,20 95:13,22 141:9 142:1 230:7 whatsoever 212:4 when 6:9 7:6 12:10,15 13:2,21,24 14:5,14 15:13 16:1 17:24 19:12,20 20:25 22:4,20 23:21 24:4,5 25:11,21,25 26:10,13,17,18 27:17,21,24 28:7, 8,15,23 29:24 30:11 32:1,19,20 33:19 34:24 35:7, 8,19 36:2,4,15,20	37:7 38:25 39:8, 12,13,17 40:9,15, 16 43:8,20 44:11, 19,20,21 45:6,11 46:23,25 47:8,14, 20 49:2,5,24 50:19 51:18 52:8,9,11, 17,20 53:6,11,24 54:8,17 55:21,23 56:2,17 57:7,13 58:15,17,20,23 59:13,14 60:11,18 61:11,24 62:8,12, 20,21 63:13,19 65:5,12 68:1,5,9, 17 69:9,20 70:1,15 72:4 74:6 78:6 79:9,20 82:1,14,22 83:14 84:7 85:10 86:12 88:17 91:10, 11 92:3,6,14 93:18 94:4,12,16 95:1,6, 8 96:6,7 97:15 99:2,6 100:5,9 101:1 102:8 103:19 107:13,25 108:1,5,11 112:15 114:2,14,15,17 115:6,24,25 116:6, 11,14,24 119:8,15 120:25 121:12 122:2,6 123:15,25 124:19,21 125:1,7, 10 127:6,7 128:3, 5,9,21 129:20 131:8 133:8,12,13, 15,23,24 134:21, 23,24 135:23 138:17 140:9 142:8,16 143:12, 13 144:23 145:6 147:23 149:18 150:3 152:5,8 154:12,19 157:3,8 158:18 159:17 160:6 165:3,10,25
--	---	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

<p>166:16,18 167:22, 23 168:8 175:22, 25 177:12,14,21 178:5,14 180:3,7, 11 181:4,20 182:2, 22 183:1,2 185:6 186:1,15,23 188:25 190:7 193:11,17 194:5 195:21 196:22,24 197:1 199:12,15, 22 200:10,25 203:1,4,17,22 208:4,5 209:1,7,8 210:9 218:15 219:5,13 222:7 226:12,14,18 227:2,6 228:9,20, 24 229:7,23 230:14,16 231:15, 17,22 232:2 234:11 238:25 239:10,11 240:7 241:20 243:10 244:12 245:6,23 246:18,24 247:18 249:8,10,13,23 251:8,11 252:11 253:1 257:1</p> <p>whenever 35:22 53:25 57:11 100:16,19 253:3</p> <p>where 10:17,19,23 11:3 17:12 27:17 28:18 33:6,16 34:1 41:24 47:20 56:6 63:3 64:17 69:24 70:9 71:14 72:1 76:21 83:1 104:21,25 107:1 110:18,19 119:13,14 121:22 131:4 137:3,4 144:21 156:11 158:14 179:14</p>	<p>184:23 187:20 190:1 195:9 198:19 214:2,17 217:22 226:6 230:8 233:6 234:24 235:15,16, 18 244:6 248:24 257:10</p> <p>Where'd 9:24</p> <p>where's 11:12 209:17,18 239:20</p> <p>Whereas 201:14</p> <p>whether 21:3 100:21 106:7 138:1 161:25 165:16 206:1 213:22 218:12 235:2 250:2</p> <p>which 21:19 23:25 25:9 27:9,10 28:2 31:5 32:10 35:2 39:14 42:2 44:10 45:6 48:7 60:24 63:17, 23 65:18 66:14 67:6 69:3 70:7 81:19 83:12 88:5 102:15 107:7 110:15 113:22 117:18 118:6 120:11 121:10 123:20 124:20 132:14 137:7 138:22 139:3,7,11 140:21 145:17 146:9 149:17 150:21 151:11 152:9,19 156:4,8 161:21 162:20 165:1 168:2,9,19 171:24,25 182:7</p>	<p>186:5 193:5 196:16 198:6 199:12 204:3 206:14 207:21 208:14 214:19 215:1,2 217:3,7,12 219:9 222:3 224:10,21 233:8, 23 234:16 238:1 239:24 243:1,17</p> <p>while 13:20 36:11 51:1, 7,12 67:25 79:17 80:5 97:6 101:22 108:12,18,21 109:5,10 118:15 119:15,17 121:18 126:4 137:23 138:9 166:10,14 180:17,25 181:22 182:13 186:21 188:21 189:10 193:12 197:3,6 200:3 205:3 219:14,16 227:22, 23,24 229:9,13 230:1 235:25 236:19 238:9 252:12,14,21,25 254:18</p> <p>whining 63:15</p> <p>who 9:14 38:9 40:6 50:24 55:10 64:11 67:18,19 80:13 81:16,17 93:3 107:24,25 126:10 145:8 187:14 188:16 195:16 196:9 197:8 199:19 201:20 204:25 228:7 239:8 240:25</p>	<p>who's 15:24 203:25 249:7</p> <p>whoever 130:1</p> <p>whole 51:15 72:22,24 73:5,6 81:4 83:5 98:13 194:6 214:1 227:25 228:7 236:5,7,17,19,20, 25 237:12 240:8</p> <p>whom 8:6 152:6 205:25</p> <p>Whose 237:16</p> <p>why 13:13 20:6 21:9 29:6 54:15,19 84:9 88:11,15 93:16 95:5 101:13 102:24 103:11,12 105:23 107:19,20 119:5 134:10 140:11,24 144:10, 14 145:4,23 146:10 154:17 168:12,15 170:20 171:2 172:3,4,11 181:17 194:11 197:12,17 200:13, 16 205:17,21 206:16 208:24 210:14,16 211:9 216:10,17 218:25 223:5 224:17 225:7,13 239:1,18 245:5 256:20,23</p> <p>wife's 254:13</p> <p>will 35:23 64:15 69:3 96:3 99:13 150:20</p>
---	--	---	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

220:19 223:13 willing 29:9,20,22 wishes 142:22 216:1 with 5:8 6:9 7:6 9:14 10:5,8,13 11:22 12:25 17:5,9 19:9 21:15 23:8,14,16, 17 24:1,2,10 29:9, 20 30:8,10,13 31:1,7,18,19,20 32:1,24 33:13,21 34:2 36:19 37:3,4 38:12,13 39:5 41:1,4,7,11,12,20, 25 42:12 46:2 47:21 50:20 51:2, 12,15 52:2,5,7,15, 16 54:13,20,24 55:12 60:24 61:1, 14 63:8 64:9 65:3, 7,8 66:25 69:6 70:4 73:17 75:5,14 77:15 78:3,5,6,24 79:3 80:8,12,15, 21,22,25 82:20 83:7 84:6 85:6 93:10,13 95:9,23 97:13,18 99:25 100:22 101:1,16 102:2 104:17 105:14,19 106:11 107:20 109:13,14, 16,17,21 110:4 112:19 114:5,6,8, 16 115:22,23 116:17 118:7,15 120:1,8,9,13,16 122:3 125:25 126:10 131:1,6,21 132:20,22 133:13, 24 136:6 138:14, 15,24 140:18	143:25 144:15 147:16 148:1,5 149:19 150:13,19 154:18 155:10 158:11 159:12,13 163:1 165:3 166:11 168:17 170:2,21 172:12 173:15 174:22 175:19 176:23,24, 25 177:6,22 182:10,16 188:7, 23 189:10 190:23 191:19 193:18 194:12,18 196:3, 19 197:19 199:3, 16,24 200:12,14 201:18,19 202:3,4, 5 205:3,15,22 207:4 208:23 213:3,6,9 216:25 217:25 219:6,7 220:11,17 224:22 225:5 227:16,17, 18,24 228:9,15,24 229:9,13 230:9 232:21 233:16 234:16 238:5,10, 21 239:10,11 240:2,22,23 241:17,24 243:11 244:14,16,19 245:19,20 249:8 within 29:23 135:24 151:2 219:24 without 134:5,8 176:18 184:19 188:1 202:1 witness 5:22 7:25 29:12 46:12,15 49:22 66:22 143:20 152:24 153:1	205:7,10,18 257:24 witnessed 93:17 witnesses 205:20,25 215:16, 18,21 216:1 241:15 won't 249:3 word 18:7 93:13 words 71:12 work 24:9 25:1,3,16,22 27:8,13,24 29:9, 20,22 31:21 32:1, 24 39:6 41:24 47:17 48:5 50:18 52:3,23 55:20 56:4,9,16,21 58:1, 13,21,23 60:11 62:10 72:3,24 74:20 79:13,17 80:24 86:5 89:22, 24 90:9 95:7,9,14, 19 97:3 98:17 106:1 114:4 116:3, 4,22 118:20 121:6, 12,14 124:2,3,6, 11,18,19 125:9,10, 25 126:15 130:10, 15,19 131:10,22 132:20 133:13 142:2,7 147:14 154:8 173:23 174:2,4,9,11 175:6,10,17 176:1, 3,13,14 178:13 179:17 183:19,23 184:11 189:20 191:7,11 192:18	193:12 197:2 208:15 224:18,19 228:3,4 229:2,10, 18 231:11,15,21 232:1,3 236:5 237:1,6 244:10 250:16 251:21 257:1,8,12 workday 57:10 157:23 worked 31:1,14,23 32:3,18 40:24 41:21 42:2, 3,4,5,7,20,23 43:4 44:23 50:21,24 55:18 59:3,4,22 60:21 61:16 81:12 84:15 111:13,17 112:20 113:8 114:2,3 115:3 132:1,6,10 154:1, 5,12 155:4 156:6 157:1 160:11 163:5,6,10,12,20, 23 164:12,14 170:16 172:9,10 173:9,16 174:6 175:19 177:8 181:25 183:24 184:16 188:3 190:11 191:10,12, 15 192:19 200:20 205:3,4,14,24 207:17,19 218:19, 22,23 219:5 220:3 working 30:16,23 31:6,9,10 37:18 38:7 46:20, 21,25 47:6,8,9,14 48:19,23 51:1,7, 12,25 52:21 53:10, 13,24 56:6,9 59:8 60:22 61:12 62:6, 8,9,12,20,22 63:19,24 64:3
---	--	--	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

66:9,11,25 79:16 89:23,25 90:3 96:11 97:11,13,14 98:2,10 100:12 108:6 109:7 111:6, 7 114:11,15,17 116:8,15 117:1 118:23 128:6 130:19 131:13,15 143:17 149:22 154:23,24 155:21, 22,24 159:7 165:18 167:24 174:24 175:7,16 177:22 179:25 180:6 181:11,13 182:14 183:24 184:15 186:10,20 187:4,17,19,22,25 188:14 189:19 190:7,9,14,17,19, 20,24 191:1,5,6,9, 22,23 192:2,4,6, 11,15 199:24 209:20 219:12,15, 17 227:25 234:12 238:5 244:4	16,18 34:4 35:10, 15,16,19,24,25 36:15 39:1,5 43:16,20,21,25 44:2,6,16,22 46:8, 22 47:20,22 48:2 50:4,14 53:16,18 56:3,11,13,15,19 57:4,5,6,9,15,16, 17 58:1,13,16,23 59:14 60:7 62:11, 15,20,21 63:4,13, 14,16,19,22,23 64:2,3,17 65:7,14 66:18 67:4,13 68:6,21 71:14,17, 18,21,22 74:9,10, 14 79:19 87:25 88:7,11 91:9 92:16,18,19,22 94:6 95:19 97:15, 16,17,19,20 98:2, 3,4,7,18,19,20,21 99:12 103:22 106:15 108:13,17 115:9,21,23,24,25 116:4,11,22 117:3, 25 118:3,21 119:16 123:16,18, 21,22,25 124:2 125:7,11 126:7,18, 24,25 127:1,2,3,4, 24 129:22 130:2, 20,21 131:2 132:7, 8 133:13,14,15,16, 17,20,23,25 134:13,25 137:9 139:8 155:18 156:21 160:7 162:16 163:2 170:23 171:8 172:18 173:23,24 174:8,10,21 175:6, 25 176:3,11,17 180:1,7,12,16,19 181:4,9,17,21	182:10,16,19,22 183:21 184:9 185:1,7,11,15,18, 19,21 186:7,15,20 187:7,9,13 188:5, 7,20,25 189:1,2,3, 6,9,10,20,25 192:21 194:11,13, 15 198:25 200:18 201:4,7 205:23 207:4,12,25 209:13,16,17 214:9 225:13,19 227:14 230:14,16, 20 231:5,16,17 235:8 239:25 242:22 243:1,9,10, 14 244:10 245:17 246:5 250:9 251:6, 9,12 252:15 253:8 255:3,12	138:5 146:12 149:20,25 154:5 180:1 184:22 194:17 200:17 207:5 214:2 216:14,17 242:25 243:22 248:19 wrecked 69:4 write 26:3 writing 93:14 142:16 201:8 212:23 216:19,21 written 88:15 91:2 141:21 147:18 204:16 214:15 wrong 37:2 144:19 196:19 197:19 209:5 213:22 wrote 88:13 146:24 147:4,9,12 <hr/> X <hr/> X- 101:23 x-ray 158:12 x-rays 157:18 XXX-XX-9880 8:13 <hr/> Y <hr/> yacht
---	---	---	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

81:15,17	9:4,7,17 10:6,10, 16,22 11:16 12:6 13:23 14:4 15:3,6, 9,20 16:11 17:7,11 20:17 21:21 22:3, 14,16,19,24 25:8, 17,19 27:4,7,15 28:22 29:12 30:5, 7,12 31:25 36:14, 19 37:16 38:2,11 39:11,21 40:2,20, 23 41:3,23 43:23, 24 45:11,17,21 46:9,11 47:3,4,24 48:4 49:1 50:5,10 51:3,14 52:18 53:5,8 54:6 55:13, 17 58:3 59:20 60:23 61:14,20 67:1,25 68:20 69:2,19 70:9 71:6, 9,12,13,16 72:13 74:3,5,15,25 75:3, 11,13,15,21,25 76:3,10,14 77:17, 20 79:8 80:16,23 81:6,8 82:3,4,13 83:6 85:12,19 86:10 87:2,7,10, 12,17 88:10,25 89:9,13,16 91:17, 24 92:12,13,18 94:1,3,16,22,24 95:4,25 97:10 99:3 100:18 101:4 102:6,13,17,20,23 103:8,24 107:9 108:14,16,20,24 110:6 112:3,6,7,10 113:3,6 118:20 120:18,19 121:16 122:19 124:3 125:23 127:12 128:7 129:12 130:4,7,13 132:10, 22 133:11,17,22	134:1,3,6 135:13, 20 136:3,9,12,25 137:6,12 139:20 140:1,23 142:19 144:4 146:15 151:8,15,25 152:4, 17 153:14,17,24 154:2,7,10 156:1 157:22 158:12,22 159:3,5 161:2,23 162:6 163:8 164:17 165:13,21, 23 167:7,11 168:7 169:6,12 173:5 175:4,9,20,24 177:5,11 178:20, 22,25 179:19,22 180:4 181:16 182:11,15,18 184:18 185:3,19 188:11,12 189:24 190:15 191:3,4,11, 18 192:13,16 194:3,5,7,15 195:12 196:3,11 198:3,11 199:25 200:6 203:6,8,12, 15,19 204:21,23 205:2,6,16 206:3, 24 208:3,22 209:6, 21 210:7 211:2,14 212:1 215:5 216:5, 9,13,16 217:18,24 218:9 220:2 221:11,14,18,21 222:14,25 223:9 224:25 225:2,23 226:17 228:7,17 229:10,17,25 230:3 231:3,4,7 232:10,13,23 233:4,17 235:14 236:2,4,23 237:4, 13,23 238:10,13, 16,24 239:7,16 240:15 241:5,9	242:2,12 243:20, 21,25 244:5 245:10,16 246:6 248:12,15 251:20 252:7 253:16 254:16 256:8,11, 19,22,24 yet 90:22 201:13 249:10 Yoga 15:2 you 5:14 6:4,5,7,9,15, 16,18,24,25 7:7, 11,13,14,19,23 8:2,4,14,18,21,24, 25 9:1,11,14,16,24 10:2,5,8,11,12,15, 21 11:7,10,14,24 12:7,10,15,20 13:4,11,13,17,21, 24 14:3,5,8,12,14 15:13,17,21 16:1, 10,22 17:4,5,9,16, 24 18:3,5,11,14,19 19:12,20,21,25 20:9,14,21,22,23 21:5,9,14,18 22:1, 4,17,25 23:3,7,12 24:1,8,12,17 25:4, 6,16,21,24 26:2,3, 4,8,18,19,22,23 27:2,3,8,10,12,13, 16 28:3,4,18,20 29:2,6,20 30:8,11, 13,22 31:14,23 32:14,18,22 33:1, 23 34:11,12,13,20 35:5,7,16,17,19, 20,23 36:4,9,11,15 37:17 38:5 39:8, 17,20 40:9 41:1, 21,24 42:2,20,23 43:10,11,16,20
----------	---	---	--

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

44:11,16,19,22 45:15,19 46:5,15, 21,25 47:1,8,10, 11,14,20,21 48:2, 6,7,17,20,24 49:2, 4,5,7,9 51:2,11,12, 15 52:5,6,11,16,19 53:3,6,9,10,11,13 54:11,13,19,22,24 55:1,4,6,12,18,20 56:2,15 57:14 58:1,4,5,6,11,13, 16,23,25 59:4,5,8, 13,21,22 60:4,11, 14,21,22 61:11,12 62:6,8,9,12,13,20, 21 63:19,23 64:3, 10,12,14,20 65:5, 11,15 66:4,9,13, 20,24,25 67:4,11 69:1,6,10,14,20 70:7,15,24 72:4, 12,18,21,22 73:4, 8,25 74:4,6 75:4,5, 6,16,19,24 76:1,4, 11,12,15,16,18,20, 21,25 77:4,8,15, 16,21,24 78:6,21, 24 79:13,17,22 80:6,11,14,20,21 81:5,19,25 82:1, 14,15,18,20 84:3, 9,16,20 85:1,6,10, 13,17,18,25 86:1, 3,15,19,24 87:9, 21,25 88:3,5,8,11, 23 89:3,8,11,15, 17,21,22,25 90:1, 8,13,16 91:2,3,4, 15,18,19,22,25 92:14,19,22 93:20, 21,23 94:2,9,14, 20,23,25 95:9,12, 13,14,21,23 96:4, 5,11,14,17,24 97:4,5,6,7,8,11,14	98:2,10,11,12,13, 15,16 99:1,6,8,12, 18,20 100:5,11,12, 13,18,21,22,24 101:2,9,13,22,23 102:3,21 103:5,9, 11,19,25 104:1,2, 10,14 105:4,9,10, 23 106:2,3,7,12, 15,21 107:1,2,8,22 108:5,6,12,13,15, 17,18,21,23,25 109:4,5,7,10,12, 17,22 110:4,7,10, 16,18,19,21,22,25 111:4,5,8,11,13, 16,18,24,25 112:1, 2,4,8,16,17,18,20 113:2,4,7,8,9,12, 17,18,19,20,24 114:1,4,10,14,17 115:2,3,6,7,8,13, 15,19,21 116:3,10, 11,14,15,16,17,19 117:2,9,11,14,15, 17,18,20,24,25 118:3,8,14,15,23, 24 119:9,10,11,14, 15,16,21 120:13, 16 121:12,13,14, 21 122:6,7,10,15, 21,22 123:6,7,8, 15,16,18,22,24,25 124:2,15,25 125:1, 5,9,11,15,17,22,24 126:9,13,24 127:15 128:5,10, 15 129:2,6,10,16, 20,25 130:5,6,8,9, 10,11 131:8,13 132:7,19,20 133:12,13,14,15, 21,23 134:4,7,10, 16,21 135:2,10,11, 12,14,17,19,21 136:2,4,6,10,13,	21,24 137:3,10,14, 17,20 138:7,10,21, 23,24 139:1,3,4, 11,12,18,21,25 140:2,3,6,7,11,22, 25 141:6,8,12,17, 21 142:1,2,6,7,23 143:1,2,9,19,22 144:1,2,14 145:6, 7,8,10,11,12,13,16 146:11,13,24 147:4,6,8,12,15, 16,18 148:1,3,9, 18,19,24 149:5,6, 12 150:10 151:3, 16,19,20,21 152:1, 2,5,8,15,18,23,25 153:9,11,13,20,21 154:4,5,8,12 155:4,5,9,17,22 156:3,4,5,6,17,18, 21 157:3,4,5,14, 17,20 158:10,13, 14,20,23 159:1,4, 7,12,13,17,21 160:10,12,15,16, 21,24,25 161:22, 24 162:2,3,4,7,12, 13,17,22,25 163:5, 7,9,12,19,20,23,24 164:2,9,10,13,15, 18,19 165:3,14,17, 20,22,25 166:10, 15 167:2,6,8,9 168:4,6,11,14,17, 23 169:1,9,11,21, 24 170:12,13,22 171:6,12,19,22 172:2,3,11,15,23 173:3,4,19,20,22, 23 174:8,10,25 175:2,5,10,25 176:1,3,11,21 177:8,9,12,14 178:3,7,8,12,14 179:15,24 180:12,	19,22 181:4,9,17, 21,22 182:5,6,10, 13,16,19,22,24 183:19,24 184:2,4, 9,21 186:10,16,17, 20 187:2,13,14,15, 16,19,20,22,25 188:1,7,8,14 189:18,19,20 190:6,7,13,19,20 191:2,6,9,12,13, 15,20 192:3,4,8,9, 11,14,17,20,23 193:5,21 194:2,4, 8,12,14,17,18 195:8,10,11,13,16, 17,22 196:5 197:2, 9,12,16,21 198:1, 2,8,9 199:2,11,12, 13,14,15,23,24 200:3,10,25 201:4, 5,9,16,17,23 202:3,4,5,6,8,12 203:4,16,17,25 204:1,2,3,11,15,20 205:3,4,7,9,12,15, 17,21,25 206:6,12, 15,18,20,23 207:2, 4,5,10,11,12,13, 19,21 208:7,9,14, 15,24 209:1,8,13, 16,19,22,23 210:4, 5,9,13,15,16,20, 21,24 211:1,3,5, 15,23 212:4,12,16, 19,20,25 213:6,8 214:1,2,3,9,12,19 215:2,9,12,17,18, 22,25 216:3,4,6,8, 10,11,14,15,17,20, 24 217:2,7,14,16, 19,21,25 218:3,11, 12,19,22,25 219:5, 19,20,23 220:1,6, 7,8,9,15,17,20 221:1,4,9,12,16,
---	---	--	---

Melinda Michaels vs Seawater Pro LLC & Michael Spanos

Melinda Michaels on 01/21/2025

19,22,23 222:6,7, 17 223:2,3,5,7,10, 11,13,21,24 224:2, 6,9,17 225:21 226:8,14,19 227:1, 2,11 228:3,4,10, 14,15,23 229:7,12, 15,23 230:4,8,9, 13,20 231:5,8,11, 22,23,24,25 232:14 233:5,6,8, 21,25 234:2,11,12, 13,14,15,16,24 235:5,6,15,16 236:1,3,6,11,21 237:1 238:2,23 239:3,14,17,18 240:2,16,21 241:4, 16,17,22 242:1,3, 8,9,10,11,13,16, 18,25 243:5,6,10, 11,17,22 244:2,3, 4,9,17,24 245:6,7, 13,21,25 246:3,25 247:5,8,10,14,17 249:13,14,18,22 250:2,3,9,10,11, 14,15,18,25 251:1, 5,18 252:3,4,10, 11,12,13,14,15,18, 22,24,25 253:1,2, 7,9,10,18,23 254:4,9,10,15,18 255:6,10,12,13,16, 18,24 256:3,9,12, 15,20,23 257:11, 15,16,17,20	you're 24:11 30:11 36:20 38:8 58:10 59:8 60:10 62:18 63:21 72:17 80:5 85:10 90:7 91:5 100:13 106:23 110:1 111:12 113:8,12, 17,24 116:6 118:12 120:15 121:13 122:6,22 123:15 128:9 130:10 135:16 144:19 146:1,3 147:12 150:1 151:12 153:23 154:23,24 156:2 158:21 162:3 163:3,10,14,19 164:18,25 166:5 169:21 172:13,16 175:22,25 176:3 177:7,17 178:8 179:8,24,25 180:25 186:22 187:12 188:6 189:15 190:24 191:1,5,9,22 192:2,12 193:6 195:2 197:6,7,17 199:7,8,20,22,23 207:18,19,20 208:1,19 211:12, 23 213:10 215:5 219:10,12 226:5 227:22,23,24,25 228:1,3,9 229:3,9, 13 230:1,4 231:14 232:2 234:11,12 235:13,20,23,25 236:5,21,22,24 238:15 239:5,8,11 246:18,19,21,24 247:1,2 249:23 251:3 254:18,25 257:1	you've 6:12 13:1 16:12,14 24:8 25:1 45:5 46:10 87:14 99:14, 19 105:12 130:9 141:17 171:11 175:5 182:6 184:15 197:7 208:19,20 210:11 217:8 youngest 195:15 your 5:14 6:3,10,12 7:6, 14 8:8,10,15 9:5,8 11:12,14 12:10,15 14:8,9,10,12,13, 14,16 15:16 18:24 19:11,21,23 20:12, 23 23:8 26:3,23 27:8 30:4,19,23,25 31:5,16 34:10 35:6 36:17 37:7,14 38:6,7 43:3 46:2 47:16,17 48:21 49:21 50:6,22 52:24 54:1 55:18, 19 56:1 57:12 60:5 61:21 63:23 64:11, 21 65:7 67:5,6,8 68:5,19 69:6,13 73:4 74:13,14,17 75:10,22,24 76:4, 11,17,22 78:20 83:23 84:1,24 85:18 87:4,15 88:1,4 89:1,4 92:16 93:10 96:21 99:17 100:3,4,25 102:21 103:11,20 104:1,9,14 108:6 111:11,16,25 113:7,13,17,24,25 116:3 119:8 121:22 125:17,18,	25 126:15 128:2,5, 13,14 129:1,5,20, 24 132:13,14,17 133:14 136:14 137:21 138:8 141:2,13 142:6,9, 16 144:14 147:24 148:4,18,21,23,25 149:14 151:7,11, 20 152:3 153:5,22 155:24 158:11,20 159:1,4 161:22 162:7,10 164:7 165:5 166:20 167:6,14 168:5 169:15,24 170:9, 10,11 171:6 172:14 173:7,19, 20 177:13 188:19 190:16,23 191:14 193:4 194:13 197:11,13 199:22 201:4,5 202:9,13 203:17 204:15,24 206:14,15,25 207:10,22 208:8, 17 209:22,25 210:4 211:16 212:12 214:3,10, 11,19,24 215:2,10, 21 216:3 217:13 218:11,23 219:19, 25 221:9,12,13,16, 22,24 222:1 223:18 225:4,14 226:7,24,25 227:22 228:9 229:1,7 230:9,25 231:13 234:22 237:6,7,8,10,24 238:2,12,14,25 239:1,13,19,21 240:2 241:16,17, 22 242:6,7,9,14 243:11 244:3,6,8 245:8,12 246:22
---	---	---	--

you'd

43:4 89:21 92:25
97:15 120:1 176:4
214:4 230:22,25
243:1,23 244:2

you'll

198:15,18

Melinda Michaels vs Seawater Pro LLC & Michael Spanos
Melinda Michaels on 01/21/2025

247:18 249:13,14,
15,17,22 250:15,
25 251:21 252:3,4,
17,21 253:23
255:1 256:17,23
257:8,16

yours

50:24 87:9 101:6
231:22 254:15

yourself

38:9 90:13,17
201:17,24 202:3
250:3 255:11,14

Youtube

20:15 67:21
148:16 219:17
248:8 252:8
256:12

Youtuber

67:20 249:7

Youtubers

56:12 97:23

Z

ZIP

10:1